



Assessment of Fair Housing Tool

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I. Cover Sheet

1. Submission date: October 4, 2016
2. Submitter name: City of New Orleans and Housing Authority of New Orleans
3. Type of submission (*e.g.*, single program participant, joint submission): Joint Submission
4. Type of program participant(s) (*e.g.*, consolidated plan participant, PHA): Consolidated Plan participant and PHA participant
5. For PHAs, Jurisdiction in which the program participant is located: New Orleans, LA/Orleans Parish
6. Submitter members (if applicable): N/A
7. Sole or lead submitter contact information:
 - a. Name: Ellen M. Lee
 - b. Title: Director of Housing Policy and Community Development
 - c. Department: City of New Orleans – Office of Community Development
 - d. Street address: 1340 Poydras Street – 10th Floor
 - e. City: New Orleans
 - f. State: LA
 - g. Zip code: 70112
8. Period covered by this assessment: 2017 - 2021
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature) (date)

(Signature) (date)

(Signature) (date)

12. Departmental acceptance or non-acceptance:

(Signature) (date)

Comments

II. Equity Guiding Principles

The City of New Orleans (City) and the Housing Authority of New Orleans (HANO) embrace the philosophy of PolicyLink in defining equity as “just and fair inclusion into a society in which all can participate, prosper, and reach their full potential”.

The City of New Orleans released *Housing for Resilient New Orleans* in June 2016 that articulated the following core principles:

- **Equity** – *Housing for a Resilient New Orleans* recognizes the important role affordable housing plays in promoting equity, and the overall importance of helping low- and moderate-income New Orleanians build financial stability and live in thriving communities with linkages to jobs and transportation.
- **Collaboration** – *Housing for a Resilient New Orleans* acknowledges that the City alone cannot meet the growing need for affordable housing in New Orleans. The City will need support from committed local, state, and federal partners, especially between the City, NORA, and the Housing Authority of New Orleans (HANO).
- **Openness** – *Housing for a Resilient New Orleans* seeks to create transparent accountability for City-led initiatives by connecting proposed activities to the City’s broader performance management system called ResultsNOLA. Furthermore, *Housing for a Resilient New Orleans* builds on the extensive, community-based work already completed through HousingNOLA, a cross-sector initiative that documented the state of housing within the City, noting the challenges that *Housing for a Resilient New Orleans* systematically addresses.

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The Housing Authority of New Orleans (HANO) and the City of New Orleans Office of Community Development (OCD) undertook a number of activities to broaden and encourage meaningful community participation. Steps that were taken to ensure meaningful community participation are as follows:

Stakeholders List

HANO and OCD developed a large list of over 100 stakeholders and grouped them by specialty area (See Appendix A – Stakeholder Engagement List). Stakeholders were charged with assisting the HANO/OCD team in outreach efforts by providing data and information to their constituents and getting their feedback on a number of AFH topics. Stakeholders were grouped into the following categories:

Housing	Neighborhood Groups
Social Services	Zoning/Urban Planning
Advocacy/Criminal Justice	Transportation
Economic/Jobs/Employment	Persons w/ Limited English Proficiency
Resident Advisory Board	Public Officials

Stakeholder Meetings

OCD and HANO scheduled a number of stakeholder meetings during the course of developing the AFH Plan. Our stakeholder meetings were characterized by three types of meetings, the general stakeholder meeting, the stakeholder capacity building sessions, and the stakeholder planning group meetings. The general stakeholder meetings were meetings that targeted over 100 stakeholders to attend and included information gathering and sharing as well as breakout sessions. The stakeholder capacity sessions targeted smaller groups that would benefit from capacity building and training to improve fair housing outreach efforts to their constituents. The stakeholder planning group meetings were weekly meetings of the seven main groups that were charged with assisting in synthesizing community input, guiding research, and identifying and addressing gaps in data. These seven groups were the City of New Orleans Office of Community Development, Housing Authority of New Orleans, Greater New Orleans Fair Housing Action Center, PolicyLink, the Lawyers Committee on Civil Rights Under Law, Greater New Orleans Housing Alliance, and Enterprise Community Partners. Attendance at the general stakeholder meetings averaged 40 stakeholders per meeting with all specialty areas represented and attendance at the capacity building sessions averaged XX stakeholders. (See Appendix B – Stakeholder attendance sheets) Meeting dates were as follows:

General Stakeholder Meeting 1	July 6, 2016
Stakeholder Capacity Sessions	July 11, 2016
Stakeholder Capacity Sessions	TBD
General Stakeholder Meeting 2	TBD
HANO Resident Advisory Board Meeting	TBD
Stakeholder Capacity Sessions	TBD
Stakeholder Capacity Sessions	TBD

Public Community Meetings/Hearings

Community outreach and feedback was also solicited at multiple community meetings including the City of New Orleans Budget meetings held in every Council district, HANO Board meetings, Resident Advisory Board (RAB) meetings, and public hearings. Meeting dates were as follows:

District A Budget Meeting	July 6, 2016
District C Budget Meeting	July 7, 2016
District E Budget Meeting	July 11, 2016
District D Budget Meeting	July 13, 2016
District B Budget Meeting	July 14, 2016
Public Hearing 1	July 19, 2016
HANO Board Meeting	July 26, 2016
Public Hearing 2	TBD

Short surveys distributed at budget meetings and stakeholder meetings garnered 49 responses, while a longer, online survey received 127 responses.

Other Outreach

Print Media – Advertisements were placed in the Times Picayune, the New Orleans Advocate, the Louisiana Weekly which is an African-American owned newspaper, Mary Queen of Vietnam bulletins, and XXXX on July 8, 2016 and August XX, 2016.

News article on Public Hearing - http://www.theadvocate.com/new_orleans/news/article_34bf02d2-4e10-11e6-bf2f-5b6de5562baa.html

Mayor Landrieu's Facebook Page posted information on the AFFH process (www.facebook.com/mayorlandrieu/)

Notices of hearings and meeting dates as well as links to AFFH information were posted on www.hano.org and www.nola.gov.

Local television news broadcasts on July 19, 2016 announced the AFFH Public Hearing on July 19th from 5:30-7pm.

Mayor Mitchell J. Landrieu appeared on National Public Radio (NPR) <http://wwno.org/> on the week of the 1st Public Hearing to discuss the AFFH and invite citizens to attend the AFH Public Hearing (Arranged by Mayor's Office of Communications).

Collaborated with the Mayor's Office of Human Needs – Americans with Disabilities Act (ADA) to provide outreach activity flyers to this target population.

AFFH survey placed on HANO, City of New Orleans, and GNOFHAC website.

Draft of AFH Plan issued on August 19, 2016 and placed on HANO and the City of New Orleans websites as well as on stakeholder websites.

Outreach Activities Description for R/ECAPS, LEP, Persons with Disabilities:

Every effort to engage and encourage community participation in the AFH process to those populations typically underrepresented was done primarily by collaborating with community organizations that worked directly with the targeted population. For persons living in the R/ECAPS, special attention was given as the AFFH Team collaborated closely with community organizations representing the target neighborhoods. Flyers were distributed door-to-door in the R/ECAP areas, as well as, distributed at the local community centers, churches, schools, and grocery stores.

For persons who are limited English proficient (LEP), all written information for the AFH is available in Spanish and Vietnamese, as those are the two highest populated LEP's in New Orleans. A representative from the Mayor's Office discussing the AFH Plan and detailing public hearings on the AFH Plan was interviewed on the Spanish radio station Tropical 1540AM (<http://www.tropical1540.com>). Spanish and Vietnamese language interpreters were available at the AFH Public Hearings and all handouts were made available in Spanish and Vietnamese.

The Light House Louisiana for the Deaf and Blind was notified of AFH activities and their services were available at both AFH Public Hearings. All AFH meetings were conducted at facilities that are handicapped accessible. Outreach activities to encourage community participation for the most underserved populations proved successful, as there was representation present to successfully communicate with our LEP and disabled residents – providing verbal and written communication in Spanish and Vietnamese so everyone could engage and provide input towards the discussion.

2. Provide a list of organizations consulted during the community participation process.

See Appendix A.

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

Successful Community Participation Process: The Office of Community Development (OCD) and the Housing Authority of New Orleans (HANO) initiated various outreach activities to engage community members in the Assessment of Fair Housing (AFH) process, initiated as part of its Community Participation Process.

The following are details provided after first public hearing July 19, 2016 from the AFFH Team:

In 2015 the U.S. Department of housing and Urban Development (HUD) released a revised legal requirement that federal agencies and federal grantees further the purpose of the Fair Housing Act. This obligation to Affirmatively Further Fair Housing (AFFH) has been in the Fair Housing Act since 1968. The City of New Orleans (CNO) and the Housing Authority of New Orleans (HANO) held its 1st Public Hearings for the 2016 Assessment of Fair Housing Plan (AFH) to receive public comments to Affirmatively Further Fair Housing (AFFH) on Tuesday July 19, 2016 at Sojourner Truth Neighborhood Center located at 2200 Lafitte Street in NOLA 70116 from 5:30-7:00pm. The Deaf Action Center provided a sign language interpreter, as well as, interpreters were available for Spanish and Vietnamese citizens in attendance with Limited English Proficiency (LEP). The 1st Public Hearing for

the 2016 AFH Plan provided an opportunity for the residents of New Orleans to provide their views on Affirmatively Furthering Fair Housing as well as share their experiences in housing disparities, housing needs and access to opportunities in their neighborhoods.

CNO's Ms. Ellen M. Lee, Director of Housing Policy and Community Development welcomed everyone to the 1st AFH Public Hearing and introduced Mr. Bob Rivers, Director of the City Planning Commission (CPC), who provided an overview of the CPC Master Plan. The CPC's Master Plan is currently opened until the end of August 2016. The CNO's Master Plan was adopted in 2010 for a twenty (20) span, shaping New Orleans' physical, social, environmental, and economic future. The Plan for the 21st Century reflects the values and priorities that emerged through a community participation process and is grounded in information assembled for the first time in one place. Mr. Rivers concluded his remarks to the citizens attending the 1st Public Hearing for the AFH, inviting them to visit the CNO's website <http://www.nola.gov/city-planning/master-plan/> or to contact the CPC at (504)658-7033 if they had additional questions.

Ms. Lee continued to address the citizens attending the 1st AFH Public Hearing, introducing the CNO's 2016 AFH partner the Housing Authority of New Orleans (HANO), Mr. Greg Fortner, Executive Director, Ms. Shelly Smith, Director of Strategic Planning (HANO), as well as, other collaborators which includes Ms. Cashauna Hill, Executive Director of the Greater New Orleans Fair Housing Action Center (GNOFHAC), Teddy K. Miller and Mary Lee, Consultants from Policy Link, as well as, OCD, HANO and GNOFHAC staff in attendance. After introductions, Ms. Lee (OCD) proceeded to describe HUD's 2016 Assessment of Fair Housing Plan to citizens in attendance. Ms. Lee described the AFFH rule as reasonably achieving a material positive change in disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns; transforming racially or ethnically areas of poverty into areas of opportunity; fostering and maintaining compliance with civil rights and fair housing laws; as well as, to access the contributing factors that limit choice and access for low-income communities and communities of color to develop goals and strategies to overcome these factors. Ms. Lee (OCD) added that tonight's meeting (1st Public Hearing 7/19/2016) would provide the opportunity for all citizens to engage and be part of the 2016 AFH process. Ms. Lee also said it was important to re-visit the history of Fair Housing in America and invited Ms. Lee, from Policy Link to provide that information to the citizens in attendance. Ms. Lee (Policy Link) gave a detailed overview of how on April 11, 1968, President Lyndon B. Johnson signed the Civil Rights Act of 1968, which included what is known as the Fair Housing Act. The Fair Housing Act was signed one week after the assassination of Dr. Martin Luther King, Jr. The Fair Housing Act is a federal law that provides protections from housing discrimination on the basis of protected classes. Ms. Lee (Policy Link) went on to share that a protected class is a characteristic of someone that cannot be targeted for discrimination under federal law (Race, Color, National Origin, Religion, Sex, Family Status, & Disability). Ms. Lee (Policy Links) concluded her remarks to the citizens attending the 1st Public Hearing, saying the Assessment of Fair Housing Plan is being conducted by cities across the country and that the input of citizens is vital in contributing to this important planning process to Affirmatively Further Fair Housing (AFFH). The audience at the 1st ASH Public Hearing applauded and Ms. Lee, (OCD) introduced Ms. Cashauna Hill, Executive Director of the GNOFHAC to address the audience.

Ms. Hill began her remarks by giving an overview of GNOFHAC being established 1995 to eradicate housing discrimination throughout the greater New Orleans area. Since its inception, GNOFHAC has built a record of advocating for the fair housing rights of New Orleans consumers through enforcement, education, and homeownership protection. Ms. Hill went on to say that people often just think of housing discrimination as the refusal to sell or rent housing after an offer has been made. However, Ms. Hill said that New Orleans' segregation patterns can be identified by disparities in housing and life expectancy in certain zip codes. Large disparities in health exist between different groups of people in New Orleans, which can be directly assessed from zip code 70112, with a life expectancy rate of fifty-three (53) (majority African-American population) and the zip code 70124, with a life expectancy rate of eighty (80) (majority White population). Ms. Hill went on to explain through a Fair Housing power point presentation that these differences systematically place socially disadvantaged groups at further disadvantage on health, compounding the significant challenges these groups already face, economically, education, housing etc. Health disparities also have a direct financial cost, as well as, an overall effect on the quality of life for residents. Ms. Hill also discussed how political decisions of the past, such as the I-10 construction on N. Claiborne Avenue in the Treme neighborhood of New Orleans continues to have a negative economic impact on a once thriving African American neighborhood. Ms. Hill added to her comments of how GNOFHAC developed and utilizes surveys to get citizens' input on the community engagement process, providing the AFH Team a "New Orleans Assessment of Fair Housing Public Comment Form" to stimulate citizen input and engagement at the 1st AFH Public Hearing. The audience applauded and Ms. Lee (OCD) proceeded to describe how citizens would be asked to complete the Public Comment surveys and break into smaller groups to share fair housing concerns and neighborhood opportunities within communities. Ms. Lee concluded her comments saying that the smaller groups at the 1st AFH Public Hearing would be addressing the following issues in relation to Affirmatively Furthering Fair Housing. The AFH Facilitators of the smaller groups addressed the following concerns. Ms. Lee (OCD) invited all in attendance to break into the smaller groups and a AFH Facilitator would pass out the Public Comment surveys so everyone could engage and provide input in the AFFH process.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Overall Comments from the 1st AFH Public Hearing at Sojourner Truth Neighborhood Center by Small Groups:

Table #1

Greatest Housing Problems

- Affordability. Most people thought affordability was the biggest problem.
- Where the hospitals are built the prices are going way up. A lot of people have been put out by the landlords near the hospitals because the landlords are raising rents.
- Displacement in the hospital region
- The only option for people is habitat for humanity.
- "If it wasn't for Section 8, I would be out on the street."

- Marrero Commons is low-income and Section 8
- Access to jobs is a problem. People working temporary jobs, jobs are not sustainable

Jobs in Different Neighborhoods

- Transportation
- Jobs are concentrated in certain areas
- Criminal background checks are keeping people from getting jobs
- Like the airport, there are a lot of jobs, but it is really far, the JP bus is different from Orleans parish
- The streetcar is being built in the Bywater where they already have transportation
- People who need transit in poor black neighborhoods have to walk a far way to get anywhere, transportation is going to the richer areas still
- The transportation is made for the tourists
- Driving, transportation close to work can be expensive
- Jobs that are close to home don't pay that much

Other issues

- Food deserts /A lot of blight in the industrial canal area
- Tapping into community services is important. There are community services but people are not aware of them.
- One bedroom market rates in tax-credits are over a year waiting list
- HCV is for very, very low income people
- Most people on the list don't get off the list until they pass away. A lot of people might qualify for the 60% units. Even on social security people are over income.
- People living in deplorable conditions. Mold, termites, lead paint, general disrepair. Leaks and not function air conditioners. Landlords are unresponsive.
- Where are people going? A lot of people living with families or in the shelters. Increase in homeless – living under the overpass, hanging out on the neutral ground, Carrollton, Napoleon,
- Rent is too much. Paying 1,200 a month with four kids to be comfortable.
- Coming out of a housing development is like “Oh my god, what am I going to do.” Choosing between being comfortable and pulling child out of college.
- Since Katrina, it hasn't gotten back to the point where it was. Conditions of homes. Some homes are deplorable and some people are living in luxury.
- People building and constantly coming in from other states and pushing people out from better areas into the slum areas.
- Students have to take the bus at 7 in the morning
- Privatized community police and neighborhood watch that goes around. The construction is well-maintained uptown. In lower-income areas construction is not as orderly. Majority of the houses in neighborhood uptown are AirBnB.
- Blight map is concentrated in certain areas of the city. In Pigeontown, only five houses are lived-in and the other are blighted.

Concerns about how investments are made

- Grocery stores. No affordable grocery stores in vast places of the city
- Building a grocery store at Columbia park, which is good, but it is the only one
- Big infrastructure to reduce flooding uptown, but there are a lot of areas that have a lot of flooding
- Not doing any work on roads in poorer black neighborhoods
- Want to see more equity in construction, levees, streets, potholes, lighting

Table #2

Greatest Housing Problems

- Not enough low-income & affordable housing.
- Bad streets & not enough lighting
- High rent versus low wages
- Low quality of housing (not up to code)
- Difficulty of upfront costs (deposits & first month rent/when you don't have assistance & even with assistance)
- Higher rent forces people out of their community

Which are available in your neighborhoods?

Schools:

- Schools, are fair, not good
- A bus is the only way to get to school, can create a very long day.
- Not enough good schools
- Problems with resources at schools.
- Lack of parent involvement.
- Not enough libraries.
- Libraries not open late enough.
-

Access to Healthy Food:

- There is Whole Foods, but it's unaffordable.
- Access to healthy food, but not affordable healthy food.
- Not enough grocery stores
- Corner store food (not healthy)
- Not enough grocery stores
- Food stamps not enough to afford healthy food.

Transit Access:

- Buses running less frequently.

Recreation Facilities:

- Recreation Facilities are available (but not programming)

Jobs & Economic Opportunities:

- Schools not offering enough vocational education.

Quality Health Care:

- Not enough neighborhood-based clinics (were more before Hurricane Katrina)
- Not enough residents have health insurance.
- Insurance is very costly, some deductibles are way too high.
- Health coverage from the State is limited.
-

Neighborhood Concerns:

- Rising rents
- Blight
- Unsafe occupied houses
- Violent crime
- Exposure to environmental health hazards
- Poverty
- Racial segregation
- Groups working w/minority poverty populations should go through undoing Racism Training

Do all communities benefit equally?

- NO

Other Comments:

- In mixed-income communities third-party managers are a problem (not community focused)
- Blighted houses a big issue
- School Buses are only on major roads, not into communities. (People) Have to walk a long way for kids to catch a bus.
- City buses also don't go into community, only outskirts on major roads.
- Community also has to take responsibility for some issues
- Uneven investment/infrastructure/development/allocation of resources in certain neighborhoods; seems like a way to push people out so developers can buy cheap and redevelop.
- Agriculture Street landfill. Built on top of a landfill. Environmental injustice. Found out in 1993. Has cancer at 34. No school in the area. No store in the area. No bus in the area. Homeowners from HANO who are paying taxes but are not able to access their properties. Want relocation for the 53 people who are left back there.

Table #3

- No knowledge of renter right and the power to enforce violation, as well as, risk of eviction
- Neighborhood Schools – better integrated with community
- Housing needs and concerns should be on substandard properties. Lots of blighted property.
- Education for the Public on renter’s rights.
- Converting Duplexes into Single-Family creates less rental housing.
- Substandard Housing.
- Demand for housing near schools, jobs, etc.
- Gentrification causing residents to be pushed to areas with a lot of poverty to areas with less amenities and transportation.
- Budget priority: build less jails, and put more funds into affordable housing and schools and youth improvement.
- Short term rentals are causing evictions and will raise rent prices.
- Not enough safe, low-income housing. “It is the housing society thinks we should have because we are low-income.”
- Everything is a concern on the list. Those people are gone. The developers come and bring these management teams come in. People were told “If we fix the gates, we are going to raise your rent.”
- We need to take the community back as a community. It is not about community anymore. Marrero Commons.
- Discrimination because a person would like more Cash instead of a Voucher.
- Public Housing taking too long to complete, like Guste.
- Schools: Need better neighborhood schools, loss a sense of community, no school pride.
- Need more affordable housing
- Live close to schools.
- Transit not good in Jefferson, New Orleans East. No regional connectivity.
- Do the individual public housing sites have a responsibility to inform tenants of what is happening in housing programs.

Table #4

- Difficulty finding a house. Slum landlords. No jobs, no healthcare. PCP licenses? Access to food pantries. Downtown and Carrollton areas. Grocery stores. Only Walmart, Family Dollar, Dollar General. Community stores with no good food
- Abandoned houses with mold, termites, etc. Landlords expect tenants to make repairs.
- Renters not having knowledge of what their rights are? Not having power to hold landlords accountable. The schools don’t seem integrated. People seem forced into accepting substandard housing. A lot of blighted housing.

Table #5

- Transportation and infrastructure. Transportation not accessible. Not taking care of people who use services.
- Agriculture street landfill. Built on top of a landfill. Environmental issues.

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward their achievement;

Goals were selected in the most recent Analyses of Impediments in 2010 were:

- Improve fair housing system capacity, access to system and ability to respond to needs.
 - Improve communication and coordination among agencies and those interested in affirmatively furthering fair housing.
 - Enhance understanding of fair housing by both consumers and providers.
 - Create a citywide process for reasonable accommodations in the comprehensive zoning ordinance.
 - Improve Human Relations Commission's capacity to respond to fair housing complaints through trainings.
- b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and

Improving Fair Housing System Capacity

To build its capacity, the Greater New Orleans Housing Alliance received a \$35,000 – one-year grant to create a blueprint for providing affordable rental and ownership housing in New Orleans for low- and moderate-income residents. The resulting plan, HousingNOLA, states five goals, one of which is to enforce and promote fair housing policies throughout New Orleans.

HUD awarded GNOFHAC several grants to build upon its work in New Orleans. In 2011 GNOFHAC received a multi-year grant from HUD for \$325,000 for enforcement of fair housing laws. In 2012, the agency received a one year HUD grant of \$325,000 to build its capacity to provide fair lending services throughout Southeast Louisiana, with a particular focus on New Orleans. In 2013, another HUD grant was awarded in the amount of \$125,000 for a year to provide fair housing education, outreach, and referral services in the greater New Orleans metro area.

The City of New Orleans continues serving low-income minority residents through funding HOME and CDBG programs that provide quality affordable housing throughout the neighborhoods of the city.

Increase Communication and Coordination

GNOHA was able to establish a Policy Working Group that met for over a year on a regular basis to produce the HousingNOLA study, a visionary document that reflects upon housing in the past, analyzes New Orleans present state of housing, and recommends strategies for making better housing-policy decisions in the future.

The City of New Orleans collaborated with the Greater New Orleans Fair Housing Action Center (GNOFHAC) as part of the HousingNOLA process. GNOFHAC provides general information to the public and to housing and other groups about Fair Housing Laws.

The City of New Orleans requires the use of HUD's Equal Housing Opportunity logo in all press releases and on all informational brochures that are used to solicit applications from owners, as well as, posts Federal Fair Housing information in conspicuous areas of the office.

Enhance Understanding of Fair Housing for Both Consumers and Providers

The City of New Orleans distributes written Fair Housing information to participating developers, owners and tenants who are involved in or affected by HUD's HOME funded projects.

The City of New Orleans requires property owner/developers selected for participation in HOME funded programs to comply with the affirmative marketing of vacant units by incorporating the affirmative marketing requirements in a written agreement, which is signed by participating owner/developers.

The City of New Orleans requires that sub-recipients' funds include a fair housing impact statement addressing not only how they will refrain from housing discrimination, but also how they will ensure that their housing and community development programs are accessible to persons with disabilities and do not contribute to or intensify segregated housing patterns.

All HCVP (Housing Choice Voucher Program) participants are advised about the program's portability feature that allows voucher holders to move to any housing authority jurisdiction in the United States at the time of voucher issuance. HANO also absorbs voucher holders porting into New Orleans from other jurisdictions to facilitate the return of families displaced by Hurricane Katrina.

HANO worked with HUD's Department of Fair Housing and Enforcement to conduct a series of fair housing workshops for landlords and tenants on various fair housing laws, including non-discrimination, disparate impact, reasonable accommodation, and the Violence Against Women's Act.

HANO conducted several staff-led workshops with landlords to discuss and resolve program issues, and improve landlord education on program rules, regulations, roles, and responsibilities.

HANO worked with HUD NOLA's Fair Housing Enforcement to host a series of fair housing workshops with landlords and property managers on the following dates: March 27, 2015, May 21, 2015, July 24, 2015, and September 30, 2015.

HCVP Department partnered with the Advocacy Center to conduct six (6) training sessions to educate the HCVP staff on reasonable accommodations and recognizing unarticulated needs for assistance and how to offer customer assistance to improve customer satisfaction.

HANO revised its hearing procedures to ensure that Hearing Officers grant a continuance of any hearing if a resident has a pending reasonable accommodation application. In making this change, HANO acknowledged that the hearing outcome may change based on the outcome of the reasonable accommodation application.

HANO revised its criminal background screening criteria.

Since 2010, the capacity of Fair Housing Initiative Programs has greatly improved. Both the Greater New Orleans Fair Housing Action Center (GNOFHAC) and the Greater New Orleans Housing Alliance (GNOHA) have received national, state, and local recognition for their accomplishments. In recognition of its efforts, HUD granted GNOFHAC several grants to build upon its work in New Orleans. In 2011 GNOFHAC received a \$325,000 multi-year grant from HUD for enforcement of fair housing laws. In 2012, they received a one year HUD grant of \$325,000 to build its capacity to provide fair lending services throughout Southeast Louisiana, with a particular focus on New Orleans. In 2013, HUD awarded GNOFHAC another one year grant of \$125,000 to provide fair housing education, outreach, and referral services in the greater New Orleans metro area.

With regards to GNOHA, in recognition of their work, they received a \$35,000 – one-year grant to create a blueprint for providing affordable rental and ownership housing in New Orleans for low- and moderate-income residents. GNOHA was able to leverage this grant to produce the HousingNOLA study, a visionary document that reflects upon housing in the past, analyzes New Orleans present state of housing, and recommends strategies for making better housing-policy decisions in the future.

Although we have made some progress on a number of goals, we have fallen short on the overarching goals of furthering fair housing to produce more mixed race and income communities in New Orleans because the goals were not specific enough to guide more targeted action to further fair housing. As a consequence, segregation and concentrated poverty areas appear to have increased and some areas have remained the same.

- c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

To mitigate problems that we have experienced, we will

- Develop specific, measurable, attainable/actionable, relevant/realistic, and timely (SMART) goals
- Evaluate progress towards goals on a quarterly basis; and
- Ensure stakeholder and community involvement in planning and implementation.

- d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Past experience has taught that we must have SMART goals instead of vague goals that lack specificity, aren't relevant to the issue, and lack time specification. To further fair housing, we understand that we must review and analyze data, set measurable goals, and take relevant actions that can be attained in an estimated amount of time.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).



Demographic Summary: According to US Census data, the demographics of New Orleans have undergone tremendous change in the period between 1990 and 2010. In this time span, the City's population has been impacted by the economic sluggishness of the nineties, and natural disasters in the early 2000s. Following the unprecedented evacuation of the entire city following Hurricane Katrina and the subsequent levee failures in 2005, the population dramatically dropped down to nearly 200,000. In the following years, that number has risen back to 384,000 as of 2014, but has yet to reach the population number of nearly a half-million people counted in the 1990 Census (495,946).

Population: Data from the U.S. Census show that the overall population is down by nearly 100,000 people from 2000 to 2014. In August 2005, Hurricane Katrina and the levee failures displaced much of the city's population. Many workers and their families returned to areas that were less damaged such as the West Bank of Orleans Parish and the unflooded areas of Uptown. Despite shrinking 11 percent since the start of the decade, parts of the metro experienced growth as population shifted away from damaged areas. While the City remains largely African American (59.6%), one of the most notable shifts in population is the disproportionate decline in African American residents. Following Hurricane Katrina,

due in large part to the influx of workers who arrived to take part in the recovery the Latino population has grown. Many have chosen to stay and have established households. While Jefferson is home to the largest number of Hispanics in the metro area, Orleans has the second largest number of Hispanics (18,051).

The breakdown of demographic and population data per HUD data tables 1, 2, and 3 and HUD Maps 1, 2, and 3 are as follows:

Overall Population – Demographic Trends

- In Orleans Parish, the overall population has been in decline since 1990.
- The overall population in 1990 was 496,882.
- In 2000, the overall population was 484,674, a decline of 12,208 people or 2.5%.
- After Hurricane Katrina, the Orleans parish population experienced a significant decline with the overall population decreasing to 343,829, a decline of 137,845 residents or 28% of its population.
- In the region, the overall population was increasing from 1990 to 2000 but experienced a decrease in 2010, after Hurricane Katrina.
- The regional overall population in 1990 was 1,285,197.
- In 2000, the regional population increased to 1,337,742, an increase of 52,545 (4%)
- In 2010, the region experienced a decline after Hurricane Katrina with the population decreasing to 1,189,866, a decrease of 147,876 people (11% decline from 2000).

Race/Ethnicity – Demographic Trends

Orleans Parish (1990 to 2000)

- From 1990 to 2000, two groups were in decline in New Orleans, the white population and Hispanic populations.
- The white population decreased from 164,396 to 128,857, a decline of 35,539 (22%) white residents.
- The Hispanic population decreased from 17,149 to 14,812 which is a decline of 2337 people (13%).
- Dissimilar to the white and Hispanic population, all other ethnic groups increased during the 1990 to 2000 period.
- The black population was experiencing an increase, growing from 304,943 residents to 326,018 residents which is an increase of 21,075 (7%)
- The Asian-Pacific Islander community increased from 8,871 to 11,740, an increase of 2,869 residents (32%).
- The Native American population increased by 836 residents, growing from 587 residents to 1,423 residents which is a huge increase of 70%.

Orleans Parish (2000-2010)

- It is important to note that during this period New Orleans experienced a mass exodus due to Hurricane Katrina in 2005 where the entire City underwent evacuation.
- Four of the five race and ethnic groups experienced a decline in 2010.

- The black population saw a drastic decline, losing 121,152 people with a population that was 326,018 residents in 2000 to a population of only 204,866. 37% of the black population was lost between 2000 and 2010.
- The white population also experienced a decline but to a much smaller degree, decreasing almost 19% from 128,857 to 104,770 which is a loss of 24,087 residents.
- Native Americans who had a huge increase between the period of 1990 and 2010 saw decline during the 2000 to 2010 period. From 2000 to 2010, their population went from 1423 to 827, a decline of 596 residents which is a 42% loss of population.
- The Asian-Pacific Islander community decreased from 11,740 people to 9,988, a decline of 1,752 (15%).
- Despite Hurricane Katrina, the Hispanic population managed to increase during this period.
- The Hispanic population experienced a 13% decline in 1990, then grew by 3,239 people increasing from 14,812 in 2000 to 18,051 in 2010 – a 22% increase.
- The black population was 67% of the population in 2000 and was reduced to 60% in 2010; whereas, the white population which was declining pre-Katrina, began to increase from 27% of the population to 30%.

Regional (1990 to 2000)

- Similar to Orleans Parish, the white population in the metro region was in decline going from 762,564 people to 731,452.
- All other ethnic groups increased during this period.
- The black population increased from 442,710 to 503,660 (60,950 or 14%).
- The Hispanic population increased from 53,723 to 58,480 (4,757 or 9%).
- The Asian/Pacific Islander population increased from 20,585 to 31,620 (11,035 or 54%).
- The Native American population increased from 3,619 to 7,656 (4,037 or 112%).

Regional (2000 to 2010)

- In the region, three of the race and ethnic groups demonstrated a decline.
- Similar to Orleans Parish, the white population (19% decline) showed a 13% decline in population going from 731,452 to 639,356 which is a loss of 92,096 people.
- The black population in the region went from 503,660 people to 403,731, losing 99,929 people or 20% of its population which is significantly lower than the 37% loss of the black population in Orleans Parish.
- The Native American population suffered a loss of 3,309 people which was 43% of its population which correlates to Orleans Parish. The population went from 7,656 in 2000 to 4,347 in 2010.
- Two populations showed an increase in the region despite the advent of Hurricane Katrina.
- Similar to the trend in Orleans Parish, the Hispanic population showed an increase. However, the increase was much more significant in the region with a 58% gain in population; whereas, in Orleans, the gain was only 22%. The Hispanic population in the region went from 58,480 people to 92,178 for a total gain of 33,698 people.
- The Asian-Pacific Islander population also showed a small increase in the region with a gain of 264 residents although they were in decline in Orleans Parish by 15% during this same period.

National Origin – Demographic Trends

Orleans Parish

- Foreign born residents had a slight decrease from 1990 to 2010 of about 200 people, less than a tenth of a percent. In 1990, the population was 20,781 and in 2000, the population was 20,581.
- During the period of 2000 to 2010, foreign born residents continued to increase even after the devastation from Hurricane Katrina. The population went from 20,581 to 21,094 which is a gain of 513 or 2.5%.
- The top three countries of origin are as follows:
 - Vietnam 4,075
 - Honduras 3,558
 - Mexico 1,751

Region

- From 1990 to 2000, foreign born residents increased from 52,998 residents to 64,166, an increase of 11,168 (21%).
- Foreign born residents also increased during the 2000 to 2010 period, going from 64,166 residents to 86,328, an increase of 22,162 (35%).
- The top three countries of origin are as follows:
 - Honduras 18,475
 - Vietnam 10,272
 - Mexico 8,489

Limited English Proficiency – Demographic Trends

Orleans Parish

- Since the 1990's the population with limited English proficiency has declined with 14,997 people in 1990, 14,168 people in 2000, and 12,527 people in 2010.
- Although the number of residents with limited English proficiency has declined, their percentage of the total population did increase between 2000 and 2010 from 2.92% to 3.64%.
- The three main languages spoken by people with limited English proficiency in Orleans Parish are:
 - Spanish 6,961
 - Vietnamese 3,296
 - French 739

Region

- While the limited English proficiency population was in decline in Orleans Parish, the population continued to increase in the region growing from 38,685 in 1990 to 42,253 in 2000, and 52,828 in 2010.
- The three main languages spoken by people with limited English proficiency in the region are:
 - Spanish 33,652
 - Vietnamese 8,354

Sex – Demographic Trends

Orleans Parish

- The female population in Orleans Parish continued a downward trend where females were once 54% (266,373) of the population in 1990 then declined to 53% (256,993) of the population in 2000, and declined further to 52% (177,581) of the population.
- The male population continued to increase its percentage of total population with 46% in 1990, 47% in 2000, and 48% in 2010.
- Although the male population increased in percentage of the total population, the percentage remains below that of the female population but the gap is decreasing every ten years.

Sex	1990	2000	2010
Male	230,509 (46.39%)	227,681 (46.98%)	166,248 (48.35%)
Female	266,373 (53.61%)	256,993 (53.02%)	177,581 (51.65%)

Region

- The male and female population in the region followed the same pattern as in Orleans Parish with the male population steadily increasing its percentage of the total population while the female population steadily decreased.
- The female and male population trend were as follows:

Sex	1990	2000	2010
Male	611,391 (47.6%)	639,558 (47.8%)	579,187 (49%)
Female	673,805 (52.4%)	698,183 (52.2%)	610,679 (51%)

Age – Demographic Trends

Orleans Parish (1990 to 2000)

- There was a nominal decline in the “under 18” age group during this period with 136,936 (27.6%) in 1990 and 132,791 (27.4%) in 2010.
- There was a nominal increase in the “18-64” age group during this period with 295,359 (59%) in 1990 and 295,082 (61%) in 2010.
- The 65+ age group was in decline between 1990 and 2000 going from 64,587 residents to 56,801, a loss of 7,786 (12%) residents.

Orleans Parish (2000-2010)

- There was a distinctive decline in those under 18 with a 45% decrease in the youth population between 2000 and 2010. The under 18 population lost 59,576 residents, down from 132,791 residents in 2000 to 73,215 in 2010.
- Between 2000 and 2010 the “18-64” population decreased by 62,107; however, the percentage of this group’s total population increased by 7% going from 61% in 2000 to 68% in 2010.
- The 65+ age group lost about 34% of its population with a loss of 19,162 residents going from a population of 56,801 in 2000 to 37,639 in 2010

- The average age for the metropolitan region has increased from 34.8 to 37.3 years old from 2000 to 2015. <http://www.datacenterresearch.org/data-resources/who-lives-in-new-orleans-now/>
2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

From the June 2016 report entitled “Who Lives in New Orleans Now” published by the Greater New Orleans Data Center, it was found that after Hurricane Katrina, Jefferson Parish and Orleans Parish initially experienced a disproportionate return of homeowners, but as of 2014, both parishes have returned to their pre-Katrina homeownership rates. With a 46 percent homeownership rate in Orleans Parish, a 62 percent homeownership rate in Jefferson Parish, and a 78 percent homeownership rate in St. Tammany, Orleans lags, Jefferson is on par with, and St. Tammany exceeds the national homeownership rate. (<http://www.datacenterresearch.org/data-resources/who-lives-in-new-orleans-now/#homeownership>)

Below is a map showing percent of renter occupied housing by block group and a map showing New Orleans neighborhoods to compare which neighborhoods have more renters.

Over time, renters have experienced rising prices and many cannot afford to live in the same neighborhoods they resided in before Hurricane Katrina. In 2000, most renter households could cover rent and utilities without spending more than 30% of their household income. Data from the 2009-2013 ACS shows that in significant swaths of the city, long-term residents' income would not be enough to pay current rents without a cost burden. African American households are even more likely to face this burden.

U.S. Census 2012 Renter Occupied Housing

B. General Issues

i. Segregation/Integration

1. Analysis

- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

According to HUD Table 3 which provides a dissimilarity index where values between 0 to 39 indicated low segregation, values between 40 to 54 indicate moderate segregation, and values between 55 to 100 indicate high segregation, the following assessments were made:

Orleans Parish

In Orleans Parish all racial/ethnic groups except Hispanics experienced high segregation with scores above 55 in 1990, 2000, and 2010.

	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction		
Racial/Ethnic Dissimilarity Index	1990	2000	2010
Non-White/White	60.07	63.44	68.31
Black/White	62.52	65.88	71.88
Hispanic/White	34.49	35.04	42.82
Asian or Pacific Islander/White	61.49	58.20	61.05

Region

In the region, all but two racial groups have consistently experienced high segregation since 1990. The Hispanic population experienced low segregation in 1990 and 2000 but experienced more moderate segregation by 2010. The Asian population experienced more moderate segregation since 1990. The HUD Data Table excerpt demonstrates this assessment as shown below.

	(New Orleans-Metairie, LA CBSA) Region		
Racial/Ethnic Dissimilarity Index	1990	2000	2010
Non-White/White	59.99	60.47	57.89
Black/White	67.78	68.42	66.74
Hispanic/White	31.33	35.79	41.01

Asian or Pacific Islander/White	50.16	47.89	52.05
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- b. Explain how these segregation levels have changed over time (since 1990).

Orleans Parish

The level of segregation has been increasing since 1990 for all groups in Orleans Parish.

The Hispanic population experienced low segregation in 1990 and 2000 with scores below 39 but began experiencing moderate segregation by 2010 with a dissimilarity score of 43.

Region

In the region between 1990 and 2000 all racial/ethnic groups increased in their experience of segregation except the Asian/Pacific Islander group.

Between 1990 and 2010 the black population and the white population had a nominal decrease in segregation. The black population dissimilarity score in 1990 was 68 and in 2010 was 67. The white population 67 dissimilarity score in 1990 was 60 and in 2010 was 58.

The Asian and Hispanic population saw an increase in segregation from 1990 to 2010 with the Hispanic population going from low to moderate segregation.

- c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Based on HUD AFFH Maps 1 and 3 and the New Orleans Neighborhood Map as captured above, the following neighborhoods demonstrate a disproportionately higher level of segregation.

Segregated

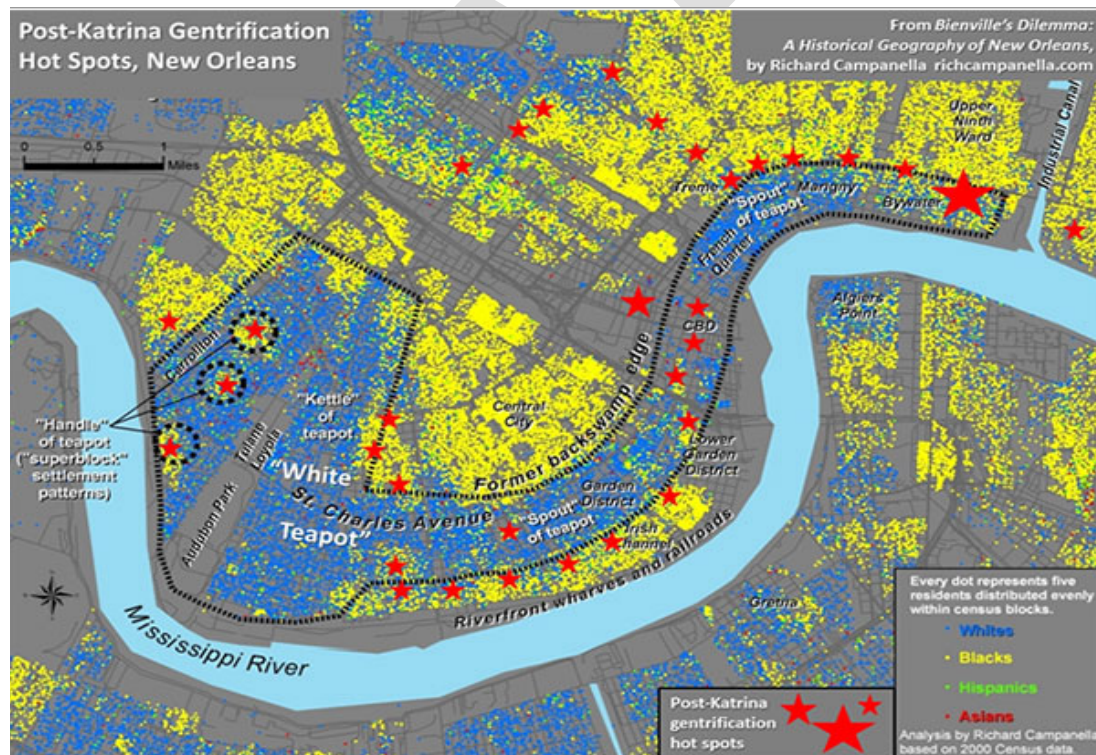
- French Quarter is highly segregated with majority white residents.
- New Orleans East communities are highly segregated with mostly Vietnamese living in the Michoud sections and Blacks and Hondurans living around Hayne, Crowder, and Chef Menteur.
- Upper and Lower 9th ward is majority black residents.
- 7th Ward, large swaths of Gentilly, Gert Town, Central City, and Hollygrove are all majority black.
- Central Business District, Lower Garden District, Garden District, Uptown, Audubon, City Park, Marigny, Bywater, Algiers Point, and all of Lakeview is majority white residents.

The below information is a summary of neighborhoods that appear to be more integrated based on HUD AFFH Maps 1 and 3 and the New Orleans Neighborhood Map.

Integrated

- River Gardens area, where a redeveloped public housing development is located, appears more integrated than other New Orleans communities.
- Fair Grounds, Treme, and some parts of Mid-City also appear more integrated than others.
- Although the Irish Channel has changed to increasingly more white residents since 1990, it still maintains a level of integration greater than other areas.
- Old Aurora and pockets of Tall Timbers/Brechtel in Algiers are more integrated communities when compared to other neighborhoods in New Orleans.

The below map depicts areas with a concentration of white, black, Hispanic, and Asian populations. This section requires an explanation of how gentrification patterns often create temporary "windows of integration" while neighborhoods are shifting from majority people of color to majority white. The Irish Channel, Treme, Fair Grounds, and Mid-City neighborhoods are perfect examples of this. The "White Teapot" Richard Campanella describes in the map below has been both internally whitening and spreading. The internal whitening has meant that once more diverse neighborhoods like the Lower Garden District and Bywater are now majority white. The spreading present in the Treme, Irish Channel, Fair Grounds, and Mid-City is the result of the fact that historical neighborhoods of color are porous to white residents, but historically white neighborhoods are not porous to residents of color.



- Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Based on data cross-referenced with the AFFH's egis mapping tool #6 and the GNO Data Center's maps (<http://egis.hud> and www.datacenterresearch.org, 2014) on concentrated areas of

poverty, the following locations of homeowners and renters and levels of segregation or integration have been captured as follows:

Central City – Central City has an African American population of 60%, as compared to a White population of 31%. There are a total of 52% of residents living in Central City who are renters and 23% homeowners in Central City.

New Orleans East ‘Little Woods’ - The Little Woods neighborhood has a population of 92.6% African Americans, as compared to a 3% White population, .9% Asian population. Forty-nine (56%) of the residents in the ‘Little Woods’ neighborhood are renters, as compared to 44% who are homeowners.

Lower 9th Ward - The Lower 9th ward is a highly segregated community with a 96% African American population compared to a White population of 2%. Renters in the Lower-Ninth ward are 36%, compared to a high homeownership rate of 64% of the population.

Gert Town - 88% of the population is African American, as compared to their White counterparts of 5% in population. Eighty-two percent (82%) of residents in Gert Town are renters and eighteen percent (18%) are homeowners.

Treme/Lafitte - Treme/Lafitte Statistical Area’ data show that 75% of the population is African American, as compared to their White counterparts of 17% in population. Sixty-six (70%) of residents in the Lafitte/Treme neighborhood are renters. Thirty-four (30%) of the Treme/Lafitte residents are homeowners.

7th Ward – Seventh (7th) Ward is also located in a segregated R/ECAP area (although recent trend show demographic changes). The data shows that 87% of the population is African American, as compared to their White counterparts of 7% in population. Sixty-five percent (65%) of residents in the Seventh (7th) Ward neighborhood are renters. Thirty-five (35%) of the Seventh Ward (7) neighborhood residents are homeowners.

B.W. Cooper – B.W. Cooper, a redeveloped, mixed-income public housing development, is another segregated R/ECAP area where the data shows that 91% of the population is African American, 7% of the population is Hispanic, and 1% of the population is White. Ninety-eight (98%) of residents in the B.W. Cooper neighborhood are renters and two percent (2%) of the B.W. Cooper neighborhood residents are homeowners.

Village de l’est (New Orleans East) – This neighborhood is located in a segregated R/ECAP area. The Village de l’est neighborhood in New Orleans East has an African American population of 55%, Asian population of 37%, White population of 4% and Hispanic population of 3%. Renters comprise 43% of the population in the Village de l’est neighborhood and homeowners comprise 57% of the neighborhood.

Lakeview - A neighborhood that can be identified as segregated and not identified as a R/ECAP area in New Orleans is Lakeview. The Lakeview neighborhood has an African American population of 1%, Hispanic population of 4% and a White population of 94%. The data shows

that thirty percent (32%) of Lakeview residents are renters and seventy percent (68%) are homeowners.

City Park/Navarre - Another neighborhood that can be identified as segregated and not identified as a R/ECAP, is the City Park/Navarre neighborhood in New Orleans. The City Park/Navarre neighborhood has an African American population of 3%, a Hispanic population of 5%, and a White population of 89%. The City Park/Navarre neighborhood has fifty-three percent (53%) homeowners and forty-seven percent (47%) renters.

Garden District - The Garden District neighborhood is also segregated with a population of 3% African Americans, 5% Hispanics, 1% Asian, and 88% White population. Renters in the Garden District neighborhood are 47% of the population, and there are 53% homeowners.

- e. Discuss how patterns of segregation have changed over time (since 1990).

According to the City of New Orleans 2010 Hazard Mitigation Plan, the significant decrease of 99,650 fewer African Americans and 11,494 fewer Whites in New Orleans post-Hurricane Katrina could be attributed to the following factors directly linked to Hurricane Katrina:

<http://www.nola.gov/getattachment/Hazard-Mitigation/Hazards-and-Planning/Orleans-Parish-2010-Hazard-Mitigation-Plan-Final-032311.pdf>

- New Orleans had a wrecked infrastructure system citywide completely shutting down vital services to residents in the wake of Hurricane Katrina.
- Loss of affordable housing in New Orleans post-Hurricane Katrina.
- Challenges re-opening schools post-Hurricane Katrina.
- Loss of Public Transportation post-Hurricane Katrina.
- Loss of Health services and facilities (Charity Hospital serving low-income population), post-Hurricane Katrina.
- Loss of amenities, such as grocery stores, drug stores, service oriented businesses, as well as restaurants and entertainment venues.
- Loss of economic development and employment opportunities post-Hurricane Katrina.
- Loss of employment as a result of Hurricane Katrina.
- Loss of community structure as a result of Hurricane Katrina.
- Loss of public services (health, government agencies, recreation, education) primarily for those with disabilities, the elderly, youth, low-income & minority population.

- Loss of 5,000+ public housing units and subsequent increase in the size of the HCVP program. Much of the city's rental housing stock was damaged after the storm and there was far less investment in rebuilding it, causing rents to spike. The few areas that remained available to voucher holders were often in majority African American, lower-income neighborhood, farther from job centers, transit, and other amenities.

The plan detailed that returning to New Orleans post-Katrina was challenging for the most vulnerable populations which included low-income African American families, people with disabilities, the elderly, and renters who found it difficult to return home because of the lack of financial services, employment, transportation, as well as suitable housing options. Residents with homeowners insurance re-populated New Orleans quicker than residents lacking sufficient homeowners insurance, as they waited for federal funding from the Road Home Program to rebuild their houses. Residents who lived in neighborhoods severely impacted by Hurricane Katrina (80% of the city) had a longer waiting period, as landlords faced challenges rebuilding their property to meet the CNO's requirements for resident health and safety occupancy. Sociologist Elizabeth Fussell, Ph.D, examines in a 2011 study entitled "*race, socioeconomic status & return migration to New Orleans after Hurricane Katrina*", that the demographic trend in population for New Orleans is that it is becoming more white and affluent, as displaced residents, primarily African Americans, have been returning at a much slower pace. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2862006/>

Data provided from the AFFH map and table #2 'demographic trends', show that in 1990, the New Orleans African American population was 304,943 (61%) and the White population was 164,396 (33%), decreasing every ten (10) years to 204,866 (60%) African Americans and 104,770 (30%) Whites in 2010.

Broadly, areas that were majority African American and on lower ground before the storm became even more heavily African American (New Orleans East, parts of Gentilly). Areas that were majority African American, but on high ground changed quickly and are now majority white or moving in that direction (Bywater, Irish Channel, E. and W. Riverside, Bayou St. John, and parts of Central City, Leonidas, Treme, St. Roch, St. Claude, and 7th Ward).

- f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

New Orleans is in the process of rebuilding the entire City after multiple recent natural and human catastrophes. The City has benefited from significant infusion of federal funding to facilitate in the rebuilding efforts. The City of New Orleans has adopted a Place-Based Strategy, which is designed to make investment in areas that are in need of public subsidy to reach full potential, and that have or will have investments that can be leveraged. The demographic trends currently taking place in New Orleans, have seen people who came to New Orleans for the rebuilding effort and decided to remain and make a home in many of our R/ECAP neighborhoods. Some people have stated that the new residents in their neighborhoods are driving some of the old residents out, causing gentrification. Other affordable housing advocates, argue that zoning ordinances limiting multi-family housing developments, keep minorities with large families out of certain neighborhoods, such as Lakeview and the Garden District neighborhoods. In some cases, rebuilding efforts have targeted public subsidy in historically African American, high-ground neighborhoods poised to gentrify. Without a complimentary

investment in affordable housing, some of these neighborhoods have already shifted to majority white and previous long-time residents are not present to enjoy the new amenities.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

In the New Orleans region, on September 29, 2006, post-Hurricane Katrina, St. Bernard Parish passed the “blood relative” ordinance, utilizing a discriminatory tool to restrict rentals to blood relatives of the owners of direct descending generations who were over 90% white. The Greater New Orleans Fair Housing Action Center filed a fair housing law suit to overturn this overt barrier to fair housing (‘How Racist Housing Laws are Keeping New Orleans White’, <http://fusion.net/story/137351/how-racist-housing-laws-are-keeping-new-orleans-white/>, 2015)

- b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

Homeowners and renters who are elderly, disabled, and or minorities tend to live in areas of low-income geographic concentrations of poverty (R/ECAPs). The City of New Orleans has adopted a Place-Based Area Strategy (PBA), which is designed to make investments in areas that are in need of public subsidy to rebuild its flood protections, its roads, bridges, schools, parks and public facilities. New Orleans has focused on eleven (11) Place-Based Areas (PBAs) throughout neighborhoods in the city. The PBAs in the New Orleans jurisdiction are populations that live in areas of low-income geographic concentrations defined by HUD as: ‘Racial, Ethnically, Concentrated Areas of Poverty (R/ECAP) in the AFFH’s maps and tables #1-15 (<https://egis.hud.gov/affht/>). These geographic areas of low-income concentration are defined as those census tracts where 51% or greater of the population is low-to-moderate income. The PBAs in New Orleans have a majority African American population. The target PBA’s in New Orleans are: Hollygrove, Mid-City, Gert Town, B.W. Cooper, Central City, Pontchartrain Park, 7th Ward, St. Roch, Lower-Ninth Ward, Riverview, and New Orleans East.

The Place-Based Area Strategic Approach incorporates the principles that a vibrant, sustainable neighborhood contains an array of resources for its residents including but not limited to housing, jobs, transportation, education and social services to assist those with special needs. Various City of New Orleans departments (e.g, Public Works, Capital Projects, Health, and City Planning Commission) all participate in the City’s Place-Based Area Strategic Plan for building neighborhoods for all residents. With this approach, New Orleans has engaged in efforts to build community assets such as community centers, libraries, improved access to transit lines, goods, services, shopping areas, cultural activities and recreational greenspace.

Mobility options for persons who are elderly and or disabled were taken into consideration when the rise of community engagement meetings took place after Hurricane Katrina. As residents returned to the New Orleans there were multiple neighborhood planning sessions that took place to engage residents in the planning process for their neighborhoods. Continued partnerships are being developed by the City of New Orleans through the public and private entities, as well as residents to make these efforts viable and sustainable by tying in the various aspects of the neighborhoods and making them livable communities for everyone. (<http://www.nola.gov/community-2012-2016-consolidated-plan-city-of-new-orleans>, p. 109)

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Community Opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

Segregated Areas

- Many homes in **New Orleans East** after Hurricane Katrina were not rehabilitated as single family homes due to the high cost of flood insurance and lack of place based investments including no hospital, limited public transportation, lack of grocery stores, banks, and other businesses. Investors purchased homes and apartments to rent to HCVP participants who are majority black residents. Also contributing to this trend was the demolition of the "Big Four" public housing developments and subsequent increase in the size of the HCVP program. Much of the city's rental housing stock was damaged after the storm and there was far less investment in rebuilding it, causing rents to spike. The few areas that remained available to voucher holders were often in majority African American, lower-income neighborhoods in New Orleans East or Algiers. In addition, New Orleans East also experienced a number of residents moving out of the neighborhood due to loss of jobs as a number the oil companies relocated from New Orleans to other locations like Houston. The oil industry continues to downsize in 2016. Gentrification has also pushed low income African Americans out of the city center and into middle and high-income segregated neighborhoods that didn't rebuild, like New Orleans East and Algiers.

- **French Quarter** has historically been where most public investments are focused such as restoring the riverfront, maintaining roads, with a lot of private investment in the form of

businesses and other leisure amenities. All of these investments create a demand for housing. In addition, the area is a strict historic district where zoning and land-use does not allow large scale developments that could support more mixed income communities and the residents of this area are often opposed to such developments. Iberville is one of the few large scale developments near the quarter but its redevelopment resulted in a net loss of deeply affordable units.

- **Garden District** area is a neighborhood with very restrictive residential zoning similar to the French Quarter neighborhood. The area limits high density projects and restricts design and materials that can be used to comply with the historic district making the area often unaffordable with limited housing.

- **Gordon Plaza** Residents Inc. A resident at the 1st Public Hearing expressed that he and about fifty-three (53) residents live in the segregated (100% African-American) environmentally unsafe upper-ninth ward Desire/Florida neighborhood of Gordon Plaza. The resident expressed that there are no schools, public transit, as well as a 92% cancer rate of residents who live in this toxic neighborhood.

Integrated Areas

- Areas such as **Treme, Mid-City**, and the **Fair Grounds** that were majority black are becoming more integrated due to place based investments. The City of New Orleans has made a concerted effort to target these areas with the support of Broad Street and North Rampart Street as main streets as well as revitalization of the Bayou Road corridor with City façade improvement grants. In addition, public investments in the Lafitte Greenway, Treme Community Center, Joseph Craig Elementary, the North Rampart streetcar, Biomedical corridor, and Iberville public housing development has created more interest from the white population in locating in these areas which has led to more integration; however, public investments have contributed to higher rents and home prices and the majority black population is moving to more affordable neighborhoods farther from job centers, transit and other amenities.

- **River Gardens/St. Thomas** area also has benefitted from public and private investments that have created an integrated community. The St. Thomas public housing development was rebuilt into a mixed income community that assisted with bringing and maintaining residents from a wide array of socio-economic backgrounds. In addition, to the public investment, private investment of Wal-Mart and a number of other businesses settled into the area which made it attractive for diverse residents.

- Redeveloping the **St. Bernard** public housing development into Columbia Parc, a mixed income community, along with other private investors rebuilding single family homes for homeownership, appears to also have assisted in making this area more integrated as Columbia Parc has attracted more white residents.

- The disparate impact in the administration of the Road Home program must be considered as a contributing factor in the slower return of African Americans to the New Orleans post-Katrina. In neighborhoods that were previously majority-African American, but are now gentrifying, challenges with the Road Home program may have prevented long-time African American homeowners from staying in their neighborhoods of choice.

Community Opposition

Information provided from Stakeholders & Public Hearings will address this factor. At the 1st AFH Public Hearing, residents expressed that people are constantly building and constantly coming in from other states and pushing people out from better areas into the slum areas. Residents also expressed community opposition that in lower-income areas construction is not as orderly as in more affluent well-maintained areas. There is also community opposition expressed by residents that a majority of houses in uptown neighborhoods are AirBnBs.

- **Displacement of residents due to economic pressures:** Gentrification of neighborhoods in PBA's leads to displacement of people of color, as neighborhoods attract new residents interested in purchasing and rehabilitating properties. This may cause a rise in property values, increasing the rent for low-income residents as well as create situations where homeowners may not be able to afford to continue living in their neighborhood due to increased property taxes. At the 1st AFH Public Hearing residents expressed that housing affordability was their biggest problem and displacement due to economic pressures of not being able to remain in neighborhoods such as Tremé (as property values soar) was a contributing factor to their living situation. Some residents expressed that "If it wasn't for Section-8, I would be on the street". Residents also expressed that jobs are only in certain areas of the CNO
- **Lack of community revitalization strategies:** Currently the City of New Orleans has many community revitalization strategies supporting the development and retention of affordable housing in its ongoing effort to rebuild its neighborhoods, especially the targeted Place-Based Area of Strategic Neighborhood Development. Residents at the 1st Public Hearing expressed that a streetcar is being built in the Bywater where transportation (buses) already exists. People who need transit in poor black neighborhoods have to walk a far ways to get anywhere, transportation goes to richer people. Residents also expressed that tapping into community services is important and that many CNO citizens are not aware of these services. Some residents expressed that transportation in the CNO is designed around tourist. Residents also express concern that their children have to take public transit at 7:00am to get to school on time.
- **Lack of private investments in specific neighborhoods:** A few of New Orleans' PBA's need more private investments. Specifically, PBA's such as Gert Town, Hollygrove, and parts of the Upper-Ninth Ward have challenges due to the lack of private investments. Residents at the 1st Public Hearing expressed that jobs that are close to home don't pay much. Residents also expressed concern that Housing Choice Vouchers (HVC) are only for very, very, low-income people and they cannot afford the rent in New Orleans. Residents at the 1st public Hearing expressed that people are living in deplorable conditions; some of which include mold, termites, lead paint and general disrepair that includes plumbing and electrical. Overall, landlords are unresponsive to tenants in certain neighborhoods. Residents at the 1st AFH Public hearing expressed the lack of private investments in their neighborhoods, such as no grocery stores, as well as, unaffordable grocery stores. Residents expressed that building a grocery store in Columbia Park is a good first step, however, it will be the only one in the neighborhood. Residents expressed that there is an

oversall lack of big infrastructure to reduce flooding in poorer black neighborhoods; however, there is a huge infrastructure project to reduce uptown flooding. Residents expressed that they would like to see more equity in the construction of levees, streets, potholes and lighting in poor black areas.

- **Lack of public investments in specific neighborhoods, including services or amenities:** New Orleans' Place-Based Areas have been active in its ongoing efforts to provide public investments in all neighborhoods throughout the city. Specifically, there are restored and newly built public libraries, restored and newly built Community Centers, as well as, Health Care Centers, Community Gardens, Greenspace and Recreational Parks in all neighborhoods. At the 1st Public Hearing residents expressed that rent is too high. Paying as much as 1,200 a month with four (4) kids to be comfortable. A resident expressed concern saying that coming out of a housing development is like "Oh my god, what am I going to do. I have to choose between being comfortable and pulling my child out of college":
- **Lack of regional cooperation:** Efforts will continue to be made on a regional level, regarding transportation for residents through the Regional Transit Authority (RTA). A resident from the 1st Public Hearing expressed that there is a great need for public transit to go from the CNO to Jefferson Parish where the jobs are located.
- **Land use and zoning laws:** Ongoing collaboration between the Office of Community Development and the City Planning Commission (CPC) will provide awareness of land-use and zoning laws in the City of New Orleans. While CPC's input is important it will not be the only perspective considered in identifying barriers on land use and zoning laws. There are examples in several neighborhoods including Lakeview, French Quarter, and Garden District where zoning restrictions have an effect on segregation. If these restrictions are justifiable and if zoning change is not possible, the City will work to overcome these barriers through other strategies. Downzoning of Lakeview after the storm restricted access to rentals and likely slowed integration in this neighborhood.
- **Lending Discrimination:** Continued collaboration through the Office of Community Development with the lending institutions regarding lending policy and homebuyer education will strengthen the communities (neighborhood people) ability to secure good loans with low interest to build wealth. An online survey conducted by AFH's collaborating partner PolicyLink show that 40% responders had never applied for a mortgage and 81% responders had applied for a mortgage. When asked about the difficulty 52% responded no difficulty, 23% responded somewhat challenging and 7% responded they could not get a loan. One resident at the 1st Public Hearing expressed that there is discrimination.
- **Location and type of affordable housing:** Segregation patterns may continue in neighborhoods that have houses that are unaffordable for low-income minorities to purchase or rent. HUD maps reveal areas of white population concentration with virtually no affordable housing. A resident expressed at the 1st Public Hearing that converting duplexes into Single-Family residences creates less affordable rental housing.
- **Occupancy codes and restrictions:** The City Planning Commission's (CPC) 'Master Plan' is a City Charter-mandated planning framework for the core systems that shape

New Orleans' physical, social, environmental, and economic future. The Plan for the 21st Century reflects the values and priorities that emerged through a community participation process and is grounded in information assembled for the first time in one place. In 2010, the Plan was unanimously adopted by both the City Planning Commission and the City Council and was signed by Mayor Mitchell Landrieu. The CPC through its Master Plan Preserve and support the character of successful residential neighborhoods. Revitalize challenged neighborhoods with new development that contributes to character and new vitality.

- **Location of affordable housing:** The overwhelming majority of subsidized housing opportunities—whether HCVP, project-based voucher, public housing, LIHTC, or soft-second—are available in lower-income, majority African American neighborhoods.
- **Private discrimination:** Continued collaboration with OCD, HANO and all Stakeholders/Public Engagement/GNO Fair Housing Action Center and others to work together and educate the public against private discrimination and affirmatively further fair housing (AFFH). An online survey conducted by PolicyLink collaborating AFH partner asked residents if they had ever been turned down when trying to rent or buy a house because of race, color, religion, national origin, sex disability and or the fact that you have children. 90% of responders said No, 11% said yes and 20% said they were not sure.
- **Other:** Ongoing education and collaboration on the AFFH.

ii. R/ECAPs

1. Analysis

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

Based on HUD Map 1, the following areas and boundaries were identified as RE/CAP areas:

Upper 9th Ward area

- North Claiborne to St. Claude and Forstall to Tupelo
- Lesseps to Congress and Derbigny to Urquhart

New Orleans East

- Florida Avenue/Peoples Avenue and Chef Menteur to Intracoastal Waterway

St. Bernard area

- Robert E. Lee to City Park Ave and Marconi to Wisner Blvd

7th Ward area

- North Broad to St. Claude Avenue and Elysian to St. Bernard Avenue
- Small portion of St. Bernard to Esplanade and N. Prieur to St. Claude

8th Ward area - Elysian Fields to Almonaster and Law to St. Claude

Iberville area - North Claiborne to Basin Street and St. Louis to Iberville Street

Lafitte area - North Claiborne to North Broad and St. Philip to St. Louis Street

Mid-City area

- St. Louis to Canal Street and N. Carrollton to N. Claiborne
- Canal Street to Tulane Avenue and Jeff Davis Pkwy to Claiborne

Central City area

- O.C. Haley to Joliet Street and Pontchartrain Expy to Toledan/Washington
- St. Charles Avenue to O.C. Haley and 1st Street to Penistion
- (Magnolia area) S. Claiborne to Lasalle Street and Napoleon to Louisiana Avenue

Gert Town area - Palmetto to Pontchartrain Expy and S. Carrollton to Hamilton

BW Cooper/Marrero Commons

Tulane/Gravier

Leonidas area - Leonidas to Monticello Avenue and Spruce St to Plum St.

Fischer area /Tall Timbers - US 90 to LB Landry and General Degaulle

Irish Channel area

- River to Magazine and Toledano to 1st Street
- River to Magazine and Felicite to Jackson Avenue
- River to Tchoupitoulas and Napoleon to Toledano
- River to Chippewa and Jackson to 1st Street

- b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

According to HUD Table 4, the highest demographic group living in New Orleans R/ECAPS, are Blacks at 49,354 (84%). All other races combined add up to 9,343 (15%) of the population living in R/ECAPS. The total number of families living in New Orleans R/ECAP areas comprise of 12,642 and families with children living in New Orleans R/ECAPS are 5,906 (46.72%). The #1 country of origin of the population living in R/ECAPS is Honduras with 1,120 (1.91%) and #2 country of origin is Mexico with 588 (1%) of the population.

R/ECAP Race/Ethnicity	#	%
Total Population in R/ECAPS	58,697	-
White, Non-Hispanic	4,507	7.68
Black, Non-Hispanic	49,354	84.08
Hispanic	3,596	6.13

Asian or Pacific Islander, Non-Hispanic	453	0.77
Native American, Non-Hispanic	151	0.26
Other, Non-Hispanic	106	0.18

c. Describe how R/ECAPs have changed over time (since 1990).

Demographic trends over time show that between 1990 and 2010 New Orleans has become an increasingly racially segregated city with neighborhoods reflecting less racial diversity. According to HUD's maps and table #2 – Demographic Trends show that in 1990 the White population in New Orleans was 164,396 (33%) and the Black population was 304,943 (61%). By 2010, the White population dropped slightly to 104,770 (30.47%) with the Black population also decreasing to 204,866 (59.58%). HousingNOLA data reports that New Orleans is evolving into a different place from the way it was before Hurricane Katrina. The population of New Orleans is still below pre-Katrina levels (Year 2000 - 482,850 total New Orleans population) and (Year 2010 – 338,502 total New Orleans population).

One of the more significant trends is that in 1990 and 2000 R/ECAP areas encompassed areas of high ground in East and West Riverside, Irish Channel, Lower Garden District, Bayou St. John, and Bywater neighborhoods, as well as portions of the Esplanade Ridge. 2010 (and ACS 2013) R/ECAP data shows that R/ECAP populations have been priced out of these areas and are now in areas at higher risk for flooding and farther from job centers and transit, like New Orleans East.

Race/Ethnicity	1990		2000		2010	
	#	%	#	%	#	%
White, Non-Hispanic	164,396	33.08	128,857	26.59	104,770	30.47
Black, Non-Hispanic	304,943	61.36	326,018	67.26	204,866	59.58
Hispanic	17,149	3.45	14,812	3.06	18,051	5.25
Asian or Pacific Islander, Non-Hispanic	8,871	1.79	11,740	2.42	9,988	2.90
Native American, Non-Hispanic	587	0.12	1,423	0.29	827	0.24

HousingNOLA reported that according to census data from American Community Survey (ACS) that New Orleans has changed dramatically from 2000-2015, with substantial shifts in demographic trends that included the African American population down by 112,315 since the year 2000. The decrease in the Black population from 2000 – 2010 can be attributed to Hurricane Katrina. In 2013, 60% of the city's population was African American, down from 67% in 2000, as a reported change overtime in New Orleans' area R/ECAP. In addition, the City of New Orleans' poverty rate remains quite high at 28%, compared to 15% nationally. Overall, the increase in New Orleans' poverty is up by 2% since 2000, indicating that poverty is getting worse in New Orleans' R/ECAP areas (www.HousingNOLA.com , 2015)

Homeownership rates remained unchanged, decreasing from 46% to 45%, still well below the national average of over 60%. Housing costs rose dramatically for both

renters and homeowners in many New Orleans neighborhoods, including some R/ECAPS. Home values have increased by 54%, and rents have increased 50% (www.HousingNOLA.com, 2015) .

2. Additional Information

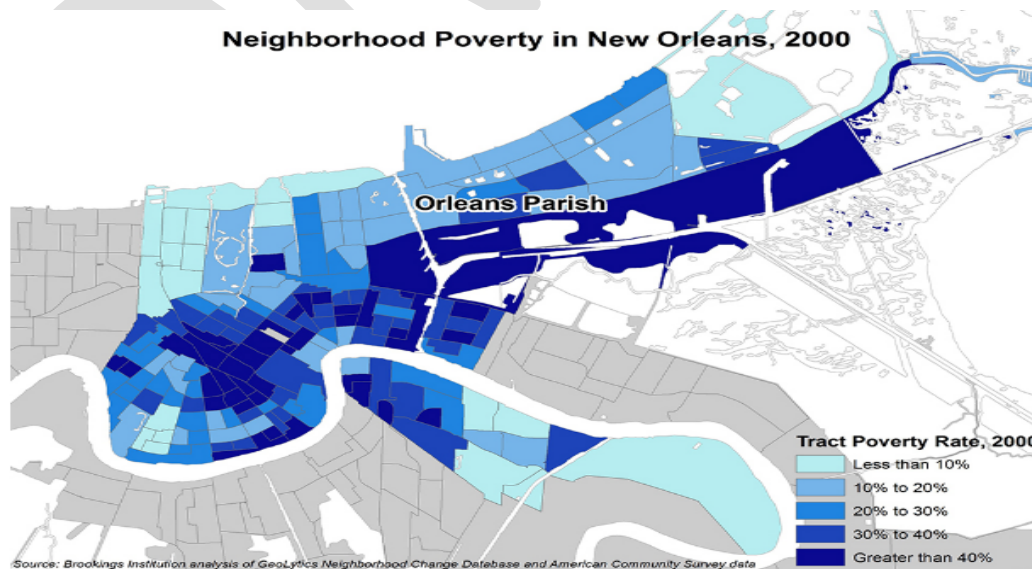
- a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPS in the jurisdiction and region affecting groups with other protected characteristics.

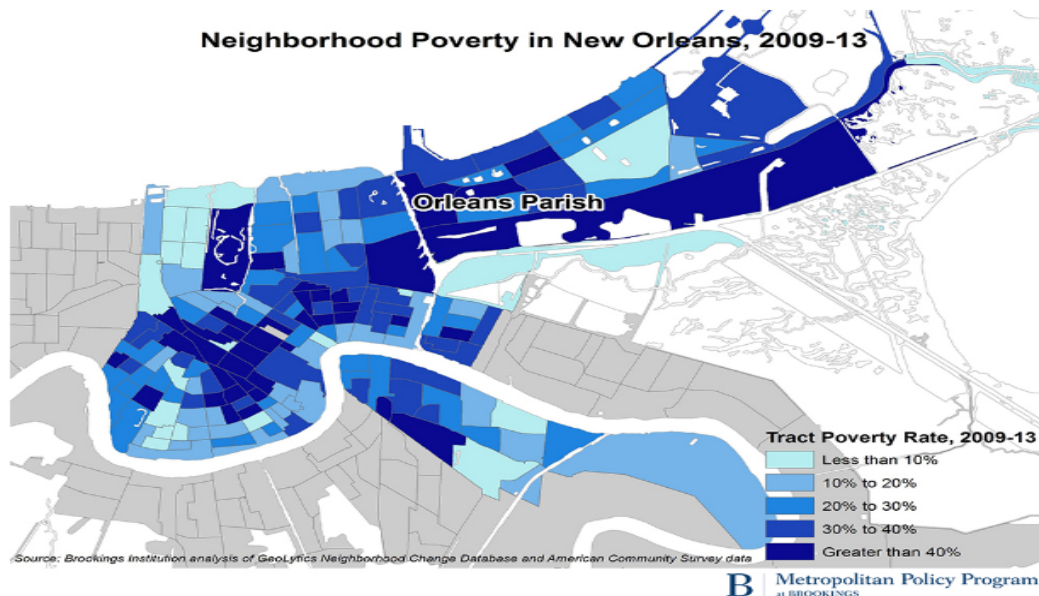
As the Data Center observes in its recent post-Katrina look at the region, the poverty rate in the city of New Orleans in 2013 (27 percent) was statistically unchanged from 2000. The city had about 33,000 fewer poor individuals in 2013 than in 2000, but the drop in the city's overall population left the poverty rate roughly the same.

http://www.datacenterresearch.org/reports_analysis/new-orleans-index-at-ten/

Analysis from Alan Berube and Natalie Holmes in an article on August 27, 2015 entitled “Concentrated poverty in New Orleans 10 years after Katrina”, indicates, that the share of the city's poor residents living in neighborhoods of extreme poverty dropped from 39 percent in 2000 to 30 percent in 2009-2013 (the latest small-area data available). This drop occurred at the same time that concentrated poverty rose dramatically in many major American cities, spurred by the Great Recession and slow recovery. Whereas New Orleans ranked second among big U.S. cities in concentrated poverty prior to the storm, it ranked 40th by 2009-2013. <http://www.brookings.edu/blogs/the-avenue/posts/2015/08/27-concentrated-poverty-new-orleans-katrina-berube-holmes>

The below maps referenced by the article and from the Metropolitan Policy Program depict neighborhood poverty in 2000 compared to neighborhood poverty in 2009-2013.





- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The City of New Orleans through a Place-Based Area (PBA) strategic neighborhood planning approach addresses the need for infrastructure, quality housing, transportation, economic development, and community investment to create truly sustainable neighborhoods. The Place-Based Area strategic planning approach provides the opportunity to address challenges often identified in R/ECAP neighborhoods. The Place-Based Area (PBA) Neighborhood Strategy is utilized to direct new investments that take full advantage of prior investments. The PBA's span the entire City, including Hollygrove, Mid-City, Gert Town, BW Cooper, Central City, Pontchartrain Park, the Seventh Ward, St. Roch, the Lower 9th Ward, Riverview/Landry, and New Orleans East. All of these areas endured massive destruction during the days after hurricanes Katrina and Rita and the ensuing levee breaches. Implementation of PBA's magnify the impact of the program funds resulting in outcomes that contribute to the revitalization of neighborhoods and creation of opportunities for residents.

The City, while focusing on eleven PBA's invests funds in all areas of the City. The PBA's Neighborhood Strategy incorporates the principle that a vibrant, sustainable neighborhood contains an array of resources for its residences including but not limited to housing, jobs, transportation, education and social services to assist those with special needs. The various City departments, e.g., Public Works, Capital Projects, all are participants in the City's PBA's Neighborhood Strategy for rebuilding and development. The successful implementation of the PBA's Neighborhood Strategy is dependent upon resident and neighborhood engagement. In all cases, the array of City facilities and investments align to address unmet demand for housing or support services for these communities. By encouraging applications to invest in these areas through the Notice of Funding Availability (NOFA) process, the City is confident of successful projects that will lead the way for greater neighborhood stability.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- **Community Opposition:** Neighborhood concerns on increased property values that may outprice them out of their neighborhood, as well as, newcomers not from New Orleans displacing long-time residents due to property tax increase, as well as, homeowners/flood insurance increase. At the 1st Public Hearing, residents expressed concern that too much emphasis was on building jails and not enough on affordable housing. Other residents at the public hearing concurred and agreed that too many jails perpetuate a sense of poverty and add to the severity of the R/ECAPS in New Orleans
- **Deteriorated and abandoned properties:** New residents are not moving to neighborhoods with high volumes of deteriorated and abandoned properties. At the 1st Public Hearing, residents listed housing needs and concerns should be focused on substandard properties. There are far too many blighted properties in New Orleans.
- **Displacement of residents due to economic pressures:** A huge factor in neighborhoods like Tremé, as the neighborhoods property values have increased by almost 50%, making it difficult for many long-time residents to remain in the neighborhood. At the 1st Public Hearing residents expressed that gentrification is causing residents to be pushed to areas with high concentrated areas of poverty (R/ECAPs), with less amenities and transportation. This can result in neighborhood segregation.
- **Lack of community revitalization strategies:** Some of the R/ECAP areas find it challenging regarding community revitalization strategies as little activity is taking place in these neighborhoods. At the 1st Public Hearing residents expressed that it is difficult to find an affordable house, as well as, locate amenities such as healthcare, services and overall healthy food in poor neighborhoods.
- **Lack of private investments in specific neighborhoods:** A few of the R/ECAP areas have limited private-investments, as the resident populations have not yet fully re-occupied the areas. At the 1st Public Hearing, residents all concurred that there is a significant lack of private investment in poorer black neighborhoods. Poorer black neighborhoods only have places like Walmart, Family Dollar, Dollar General, and Community Stores with no good food.
- **Lack of public investments in specific neighborhoods, including services or amenities:** Some of the R/ECAPS such as the Lower-Ninth Ward and New Orleans East have been facing challenges due to limited public and private investments (slow to repair infrastructure/public spaces), as well as general services such as health care, grocery stores, retail outlets, and restaurants. At the 1st Public Hearing, residents expressed that the CNO should set better budget priorities: Build less jails and put more funds into affordable housing and schools and youth improvement. Residents also expressed concern about the amount of time it is taking to complete Public Housing projects like Guste.
- **Lack of regional cooperation:** Challenges still exist regarding RTA working with the City of New Orleans to provide bus services to surrounding parishes such as St. Tammany Parish. At the 1st Public Hearing, residents expressed concerns that the regional transportation system to Jefferson is not good and the local transportation to New Orleans East is not good, no connectivity on these transit lines for people.
- **Land use and zoning laws:** Land-use and zoning laws need to be re-visited as they often present barriers to protected classes when trying to obtain quality housing in their neighborhoods of choice. At the 1st Public Hearing residents expressed that short term rentals are causing evictions and will raise prices on rent for poorer people. Residents

also expressed concern of how zoning laws enforced through CPC can keep poorer people out of neighborhoods by limiting the amount of affordable housing duplexes in certain areas.

- **Location and type of affordable housing:** Challenges exist regarding the location and type of affordable housing available in areas not designated as R/ECAPS. At the 1st Public Hearing, residents expressed the need for more affordable housing in areas that are not distressed (in better neighborhoods). In addition, there is a great need for single-family three (3) bedroom affordable housing for families.
- **Occupancy codes and restrictions:** Continued collaboration with OCD/Safety & Permits/HANO to address occupancy codes and restrictions that present challenges to our protested class. Resident at the 1st Public Hearing expressed concern over converting duplex housing into single-family housing, saying that it creates less rental housing and keeps low-income people out of certain neighborhoods.
- **Private discrimination:** Continued collaboration with the GNO Fair Housing Action Center addressing private discrimination of our protected class regarding housing and neighborhood choice. At the 1st Public Hearing, some residents expressed that renters do not always have knowledge of what their rights are. In addition, residents don't feel like they have power to hold landlords accountable. Also, one resident said that schools (public & private) don't seem integrated and the poor black people all seem to be at inferior substandard schools.
- **Other:** Input provided at the public hearings as well survey findings from residents in the community. At the 1st Public Hearing many residents overall expressed significant concern about their concerns over slum landlords and how the landlords expect the tenant to make repairs on the house. Public housing redevelopment, increase in vouchers, and reconcentration of poverty in farther flung neighborhoods.

iii. Disparities in Access to Opportunity

1. Analysis

a. Educational Opportunities

- i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

According to information from the GNO Data Center in its report "The Transformation of New Orleans Public Schools", August 21, 2015, pre-Katrina New Orleans had the next-to-lowest ranked public school district in the State of Louisiana. After a series of reforms in New Orleans, public education can be described as having one of the most dramatic before and after Hurricane Katrina images. Once managed by the Orleans Parish School Board, the traditional public school district received a \$1.8 billion dollar FEMA grant to build new and/or renovate existing school structures.

http://www.datacenterresearch.org/reports_analysis/school-transformation/

A study released by Tulane University's Cowen Institute in 2010 articulated the changes to the traditional public school district after Hurricane Katrina. According to the study the state shifted 107 low-performing OPSB schools into the Recovery School District (RSD). The RSD was charged with opening and operating the 100-plus schools under its

control for an initial period of five years. The OPSB retained control over 16 schools that had performed above the state average before Katrina. Both the OPSB and the RSD opened traditional schools and charter schools to serve the returning student population. As they reopened after Katrina, schools operated by both the RSD and the OPSB became *city-wide access schools*. This means that every public school, charter or directly-run, can be attended by any Orleans Parish student regardless of where they live in the Parish, provided there is capacity at the school of their choice. (www.coweninstitute.com/wp-content/uploads/2010/07/katrina-book.final_.C1pageSmaller.pdf)

Although on the surface it appears that students have the ability to access more proficient schools, the below data captures issues that persist under the new regime.

According to a study done by the Southern Law Poverty Center (SLPC) analyzing the 2007-2008 school year:

- 98% of the students were African American in the Recovery School District (RSD) which is the system that ran the majority of public schools in Orleans Parish. RSD took over low-performing OPSB schools at this time;
 - 79% of students were low income in RSD schools;
 - In the 2007-08 school year, approximately 28.8% of Recovery School District (RSD) students (3,537) were suspended from school. The suspension rate in schools operated by the RSD is more than twice the state average and more than four times the national rate.
 - Dissimilar to the Recovery School District in Orleans Parish, in other jurisdictions like St. Tammany Parish only 18.5% of students are African American, 42.5% are low-income, and only 8% of students were suspended.
 - In St. Charles Parish, where only 36.4% of students are African American and 45.1% are low-income, only 4.1% of students were suspended from school.
 - According to a study done by the Cowen Institute analyzing the 2009-2010 school year, the vast majority of Orleans Parish public school students, over 90 percent, were still African American compared to 61 percent of the city's population.
- ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Although New Orleans youth can access schools in any area on the City, there is still a pattern that shows more proficient schools are located in white, affluent areas or close to those areas. For the 2015-2016 school year, the Cowen Institute prepared an analysis of the location of schools based on a letter grade to aid families in school selection. Their analysis group schools by five locations within the City. The letter grade is based on school performance scores (SPS). <http://www.speno2014.com/governance-school-guide/>

This is illustrated below:

Downtown/9th Ward

- Of the six schools in this area, 33% of schools rated D, 33% rated C, and 33% rated B.

- One B school, McDonogh 15, is located in the majority white and affluent neighborhood of the French Quarter.
- The other B school is located in a majority African-American neighborhood where residents have a high rate of homeownership compared to other areas of the City.

Central City/Garden District

- Of the nine schools in this area, 13% rated D, 50% rated C, 13% rated B, and one rated T. T indicates a school was recently taken over by a charter school due to it receiving a failing score from the last school year.

Uptown/Carrollton

- Of the eight schools in this area, 63% were rated C, 25% rated B, and 12% rated F.
- B schools are located in white affluent areas
- C schools are in mixed racial/ethnic and national origin zones.
- F school is located in a R/ECAP area

Mid-City/Lakeview

- Of the fifteen schools in this area, 13% rated F, 7% rated D, 33% rated C, 13% rated B, 20% do not have students in tested grades and 13% were takeover schools with no scoring.
- Both F schools are located in areas near public housing. One near BW Cooper/Marrero Commons public housing and the other F school is near St. Bernard/Columbia Parc public housing.
- The D school, Medard Nelson Elementary, is also near St. Bernard/Columbia Parc public housing.
- B schools are located in areas with more white and affluent residents along Canal Street and S. Carrollton Avenue.

Algiers/Westbank

- Eight (8) schools with 63% rated D (25%) and F (38%), 25% rated B, and 13% rated A.
- Algiers has the only A rated school in Orleans Parish, Alice Harte. It is located in an upper middle class neighborhood, inhabited by a typical age distribution and moderately educated. This area is also home to Edna Karr a B rated school.
- The other B rated school, Martin Behrman, is located in the Algiers Point section which has increasingly become a more white and affluent area than other areas of the city.
- Two of the D schools are located near the Fischer public housing development.

N.O. East/Gentilly

- 6 schools with 17% rated F, 17% rated D, 33% rated C, and 33% rated B.
- F school is located in a R/ECAP area along Dwyer Road.

- B schools are located in African-American neighborhoods that have a high incidence of homeownership with one school being in Pontchartrain Park and the other in Gentilly near Franklin Avenue.

Based on information from the GNO Data Center entitled ‘The Transformation of New Orleans Public Schools: Addressing System-Level Problems’, as integration began in the late 1950’s, whites fled New Orleans public schools and by the 1970’s middle-middle class blacks also began abandoning the city’s public schools, leaving behind a high population of low-income African American students. Just before Hurricane Katrina in 2005, the New Orleans public school population was 94% African-American, with 73% qualifying for the free or reduced lunch program (the citywide child poverty rate in 2005 was 41%). Prior to Hurricane Katrina, like the vast majority of the nation’s school districts, OPSB schools were arranged by neighborhood zones. After 80% of New Orleans flooded as a result of Hurricane Katrina, the number of available schools dropped, resulting in the removal of attendance zones. In an effort to promote fairness, equity, and transparency for the school application process, the Recovery School District created a centralized enrollment system called OneApp.

http://www.datacenterresearch.org/reports_analysis/school-transformation/

- Describe how school-related policies, such as school enrollment policies, affect a student’s ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

Policies affecting ability to attend a proficient school

The below information is based on a report by the Boston Consulting Group entitled “State of Public Education in New Orleans” dated June 2007 and depicts how school related policies developed after Hurricane Katrina affected attendance at proficient schools by protected class groups. (<https://www.bcg.com/documents/file15048.pdf>)

- From 1995 to 2005, public school enrollment in Orleans Parish decreased 25 percent, while non-public school enrollment increased by 5 percent as a result of the public school system’s inadequacies. Therefore, most families with the financial means took their children out of public schools.
- In December 2005, in light of its precarious financial situation and the loss of most of its schools, the Orleans Parish School Board fired 7,500 school district employees that had not already been rehired by one of its remaining schools. This resulted in the decrease of veteran teachers; whereas, approximately 40 percent of teachers had more than 20 years of experience. After the mass firing, in the second full school year after the storm, 2007-2008, more than half of all teachers had three or fewer years of teaching experience.
- In 2008 the OPSB and the RSD adopted a comprehensive plan to renovate, rebuild, or land bank existing buildings over the next 10 years which should give more students access to improved facilities.
- RSD students are suspended at a rate that is more than three times the rate of suspension in neighboring, mostly white, affluent school districts in the region; and
- The expulsion rate in the RSD was almost twice the statewide rate, and 10 times the national rate which demonstrated the lack of proficiency during this time to maintain students in a learning environment.

Disabled

The Southern Poverty Law Center in its report entitled “Access Denied: New Orleans Parents and Students identify Barriers to Public Education” discusses the policies that create barriers for the disabled protected class in attending proficient schools as it reviews the 2007 to 2009 school periods. (www.splcenter.org/sites/default/files/d6_legacy_files/downloads/publication/SPLC_report_Access_Denied.pdf)

The findings were as follows:

- Since 2007, the percentage of students with special education designations had steadily risen, from 6 percent in 2007 to 8 percent in 2009; however, some students with disabilities in New Orleans public schools were completely denied enrollment as a result of their disability, forced to attend schools lacking the resources necessary to serve them and suspended in record numbers. P. 10
- The graduation rate for RSD students with disabilities was less than half of the overall graduation rate and only 6.8% of RSD students with disabilities exited with a high school diploma, while across the state, the average was 19.4%.
- In the 2008-09 school year, RSD schools suspended nearly 30% of all students with disabilities — a rate that was 63% higher than the state average.
- During the 2007-08 school year, 94.6% of eighth grade RSD students with disabilities failed the Louisiana Educational Assessment Program (LEAP) exam. For the same year, 78.3% of all eighth grade charter school students with disabilities failed the LEAP.
- On average, school districts throughout Louisiana have identified 12.2% of their students as eligible for special education services. New Orleans Public Schools have identified only 8% of their students as eligible for special education services. Comparable school districts throughout the country identify almost twice as many students with disabilities.

LEP

The Limited English Proficiency population as a national origin protected class has also been reported to have barriers to attending proficient schools in New Orleans.

- In 2013, VAYLA (Vietnamese American Young Leaders Association) and the Asian American Legal Defense and Education Fund (AALDEF) filed a DOJ Complaint on Failing Language Services in New Orleans Schools. They alleged that the school district has violated Title VI in failing to meet the language needs of Asian American and Latino limited-English proficient (LEP) students. District-wide, these students and their families have been underserved, severely damaging their quality of education and putting them at a huge disadvantage to attaining success in their schools. (<http://aaldef.org/press-releases/press-release/groups-file-doj-complaint-on-failing-language-services-in-new-orleans-schools.html>)
- 54.9 percent of Asian and Latino students said that there are no teachers or staff at their school who speak their parents’ native language. (Pg. 5, <http://ryhcnola.org/wp-content/uploads/2013/02/ESL-Lost-In-The-Sytem-2013.pdf>)
- Only 16 percent of students from families classified as having limited English proficiency said that their parents are offered interpreters or translators for important school meetings. <http://theadvocate.com/news/neworleans/5770545-148/new-orleans-students-find-shortcomings>

In New Orleans, “school choice” refers to the range of policies that allow parents to select the school they want their children to attend. Prior to Hurricane Katrina, schools were arranged in

neighborhood zones, much like the majority of the school districts throughout the country. Schools would primarily enroll students from their respective zones and would accept students from outside their zone if there was a seat available. Delivery of public education changed dramatically in New Orleans after Hurricane Katrina, however student demographics have remained similar. According to the Data Center study, New Orleans public schools are only slightly more diverse than before the storm. White enrollment has moved slightly upward from 3% in 2004-2005 to 6% at the start of the 2014-2015 school year. The Data Center study notes that whites are concentrated in schools with selective admission tests authorized by the Orleans Parish School Board. In addition, a higher influx of Hispanics to New Orleans and the surrounding region has resulted in a growth of Hispanic students in the public school system from 1% in 2004-2005 to 5% in 2013-2014. As stated above, in 2004-2005, African-American student enrollment in New Orleans public schools was 94% and in 2013-2014 enrollment went down slightly to 87%. According to the Data Center, the overrepresentation of poor, black students in public schools is largely due to the fact that white and middle-class families opt out of the public sector and choose private and parochial schools at significantly higher rates in New Orleans. Only 10 percent of students nationwide attend private schools. In New Orleans, a quarter of students attend private/parochial schools. (http://www.datacenterresearch.org/reports_analysis/school-transformation/)

b. Employment Opportunities

- i. Describe any disparities in access to jobs and labor markets by protected class groups.

There are clear disparities indicated in access to jobs and labor markets using the Jobs Proximity and Labor Market indices that HUD provided in Tables 12 and Maps 10 and 11. In these indices the higher scores indicate higher levels of labor engagement and closer proximity to jobs. Disparities noted are:

- The white population has a very high score of 73.88 which indicates extremely high levels of labor engagement to jobs but all other racial/ethnic groups are well below by approximately 30 points and one group below by almost 45 points.
- The Black population has an extremely low opportunity to access labor with a score of 29.28 as compared to whites with a score of 73.88, Hispanics with a score of 48.22, Asians with a score of 42.68, and Native Americans with a score of 47.56.
- The white population also lives closer to jobs with a score of 55.71 but the Hispanic population is not far behind with a score of 52.64.
- The Asian and Native American population also appear moderately close to jobs with scores of 48.78 for Asians and 46.41 for Native Americans.
- Again, the black population has the lowest access to opportunity being farther away from jobs with a score of 40.10 which is over 15 points below the white population and about 13 points below the Hispanic population.

Jobs in New Orleans are spread out across the city and metro area, with most jobs occurring in the following major clusters: the Central Business District (CBD)/French Quarter, Veterans/Causeway/I-10 area, and the greater Elmwood Corridor, according to a 2010 study “Job Sprawl in Metro New Orleans” conducted by the GNO Data Center. Statistics from the Data Center show that Jefferson Parish has more jobs than Orleans Parish in all income categories and together the two parishes account for $\frac{3}{4}$ of all regional jobs. Jefferson has more than 43,000 low-wage jobs paying less than \$1,250 a month, with nearly 22,000 of these workers commuting into the parish for work. Orleans Parish has the second largest number of low-wage jobs. There are also a sizable number of moderate-wage jobs paying \$1,251 to \$3,333

per month in both Jefferson Parish which has 81,441 moderate-wage jobs and in Orleans Parish which has 59,554 such jobs. (www.datacenterresearch.org/reports_analysis/job-sprawl-in-metro-new-orleans/)

- ii. How does a person's place of residence affect their ability to obtain a job?

According to an article published in the City Observatory on March 27, 2015 entitled "How Important is Proximity to Jobs for the Poor", place of residence affects one's ability to obtain a job because the closer in proximity to the majority of jobs, the less one has to rely on personal vehicles or public transportation to seek and/or maintain a job. Some jobs are inaccessible unless one has the means to afford a personal vehicle. People living in the R/ECAPs of New Orleans have more challenges finding a job because there are less economic opportunities of employment in their neighborhood. <http://cityobservatory.org/how-important-is-proximity-to-jobs-for-the-poor/>

- iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

Based on the Jobs Proximity and Labor Market indices that HUD provided in Tables 12 and Maps 10 and 11, the Black population is the least successful in accessing employment with a dismal score of 29.28 which is 44 points below the white population (73.88) and almost 20 points below the Hispanic population (48.22).

Although the Hispanic population access to jobs is greater than other minority groups, it appears according to HUD Map 11 that those of Honduran national origin appear to be less likely to have opportunity to access the labor market.

The Vietnamese population also seems to be less likely than other national origin groups to have opportunity to access the labor market.

With regard to family status, areas with greater access to the labor market generally have between 0 to 20% households with children. Areas with less access to the labor market tend to have between 80 to 100% households with children.

According to a report issued by the City of New Orleans NOLA for Life Program in August 2014, the young African-American male living in concentrated areas of poverty is the least successful in accessing employment due to lack of education, some with criminal records, lack of transportation as well as lack of access to networking. http://www.nolaforlife.org/images/economic-opportunity/bmu-report_final_pages2/

c. Transportation Opportunities

- i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

Based on the Low Transportation Cost and Transit Trips indices that HUD provided in Tables 12 and Maps 12 and 13, the access to transportation is as follows:

- Hispanic population has greatest access to transportation. 63.36
- White population is second. 63.12
- Native American population is third. 63.08

- Black population is fourth but nominal difference. 60.72
- The Asian population has the least access. 56.58

HUD Table 12 also indicates that the cost for transportation does not show wide disparities. The cost of transportation for racial/ethnic groups is as follows:

- Hispanic population has the lowest costs for transportation. 65.40
- White population is second. 64.53
- Native American population is third. 64.53
- Black population is fourth but nominal difference. 60.53
- The Asian population has the least access. 51.21

- ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

The Asian population is most affected by lack of access to transportation and lack of affordable transportation based on HUD Table 12. Within the Asian population, the national origin group that is most affected by lack of access to transportation and lack of affordable transportation is the Vietnamese population according to HUD Map 12.

Family Status - According to HUD Map 12, in areas with lower transportation costs and lower transit times approximately 0 to 20 % of families have children; and in areas with greater transportation costs and greater transit times between 80 to 100% of families have children.

- iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

According to the U.S. Department of Federal Transportation's April 2007 report entitled "Realizing the Potential: Expanding Housing Opportunities Near Transit", the average American family spends more than half of their income on housing and transportation. The average family spends 19 percent of the household budget on transportation, and households in auto dependent neighborhoods spend 25 percent, households with good access to transit spend just 9 percent. So while a growing number of families are moving further out to suburban or even exurban locations to find affordable housing, the rising cost of transportation reduces much of their cost savings. As a result, demand for housing near transit, so that transportation costs are contained, is expected to grow over the next 20 years.

<http://www.reconnectingamerica.org/assets/Uploads/2007RealizingthePotentialweb.pdf>

Based on this premise, public transportation routes and transportation systems designed for use of personal vehicles can impact protected class groups access to opportunity as the more one spends on transportation the less one has to spend towards quality housing, education, and other needs. Below is a look at the various modes of City and regional transportation and how they affect protected class groups.

New Orleans Transportation

Public Transportation: According to the "State of Transit" report published by Ride New Orleans in 2015, New Orleans Regional Transit Authority (NORTA) continues to operate less

transit service after Katrina. Ride New Orleans has indicated that before Katrina, NORTA buses and streetcars made more than 17,000 trips each week and by 2015, that number had fallen to just 7,813 which represents a 55% decline in available transit service. This lowers the accessibility to affordable transportation to families that may not have the means to have a personal vehicle and may increase transit times which can cause less access to resources because of the many transfers that may have to be made to access jobs and other resources. <http://rideneworleans.org/wp-content/uploads/2015/08/sots2015new.pdf>

The Ride New Orleans report indicates the neighborhoods that are most affected by the reduced transit service are in RECAP areas. According to the report, those hardest hit have seen only 20% to 40% of their transit service recovered. These neighborhoods include: Little Woods, West Lake Forest, Desire, Read Blvd West, Filmore, Viavant / Venetian Isles, Lake Terrace & Oaks, Lower Ninth Ward, Read Blvd East, Pontchartrain Park, Village de l'est, Bywater, Hollygrove, St. Claude, Lakeshore / Lake Vista, Dillard, Seventh Ward, Tremé/Lafitte, St. Bernard Area, Tulane / Gravier, St. Roch, St. Anthony, Pines Village, and Marigny.

In addition, streetcars have taken prominence over buses according to Ride New Orleans. Although streetcars offer more frequent rides, they are mostly placed in areas with a majority white and affluent population. Ride New Orleans identifies the neighborhoods with the most frequent streetcar service as #12 St. Charles Streetcar, Loyola-UPT Streetcar, Canal-Museum/City Park Streetcar, Canal-Cemeteries Streetcar, and the Riverfront Streetcar. On average, New Orleans' five streetcar lines provide service every 17 minutes during peak hours. Bus riders, however, often have to wait twice as long with the average peak hour frequency of all of NORTA's bus routes combined at 38 minutes. "Status of Transit", Ride New Orleans, 2015.

Lack of Light Rail express transportation:

The Regional Transit Authority (RTA) in New Orleans boasts that the authority has been at the forefront of the light rail system renaissance for decades by operating three rail lines; the historic St. Charles Avenue Streetcar line, the Canal St. Streetcar line, and the Riverfront Streetcar line. These rail lines serve more than 15,000 riders to work, school, and entertainment venues every day. <http://www.norta.com/Media/News-Events/New-Orleans-Rail-A-Historic-Asset-Paving-the-Way-t.aspx> However, the number of riders served are less than 4% of the New Orleans population and the lines are in affluent neighborhoods of the Garden District, Mid-City, and the French Quarter.

Transportation with Personal Vehicles:

Post-Katrina, the share of New Orleans households without access to a vehicle has dropped from 27 percent in 2000 to 19 percent in 2014, according to the June 2016 Data Center report, "Who Lives in New Orleans and Metro Parishes now". Data Center concludes that at 19 percent, New Orleans' percentage of individuals without access to vehicles is more than twice as high as in neighboring parishes and the nation, indicating the importance of a robust public transportation system and comprehensive evacuation plan. <http://www.datacenterresearch.org/data-resources/who-lives-in-new-orleans-now/>

Regional Data on Connectivity

Regional transit times are important as addressed in a Harvard study released in April 2015 that concluded that commuting time has emerged as the single strongest factor in the odds of escaping poverty. The longer an average commute in a given county, the worse the chances of low-income families there moving up the ladder. The relationship between transportation and social mobility is stronger than that between mobility and several other factors, like crime, elementary-school test

scores or the percentage of two-parent families in a community, said Nathaniel Hendren, a Harvard economist and one of the researchers on the study. http://www.equality-of-opportunity.org/images/nbhds_exec_summary.pdf

The Coordinated Public Transit -Human Services Transportation Plan completed by the Regional Planning Commission (RPC) of Jefferson, Orleans, Plaquemines, St. Bernard, and St. Tammany Parishes admits that during planning there was a consistent theme throughout the coordinated planning process concerning lack of regional connectivity, particularly when transferring from one system or mode to another.

Public Transportation:

In an earlier RPC study conducted in 2012 entitled “Origin Destination study”, the RPC demonstrated that trips are often regional in nature. According to the same study more than half of all trips on the fixed route public transportation system require at least one transfer. These issues are exacerbated for transportation disadvantaged populations, especially for persons who rely on the public transportation system for most or all of their travel needs. Such riders may have non-traditional trip purposes (such as medical or non-peak hour/weekend employment trips) and unique limitations on time and resources. They may also have a far more difficult challenge navigating a complicated system. From an operator perspective, poor connectivity may lead to an inefficient and undesirable system as well as increased rider reliance on an expensive paratransit system. http://www.norpc.org/assets/pdf-documents/studies-and-plans/Coordinated%20Plan_2013.pdf

Lack of Light Rail express transportation: In June 2005, prior to Hurricane Katrina, the New Orleans Regional Planning Committee released a policy plan for transit oriented development entitled “New Orleans Light Rail Transit Project”. This policy plan supported the development of a Light Rail Transit (LRT) project between the Louis Armstrong International Airport in Jefferson Parish and Downtown New Orleans.

According to an article in the Times Picayune on July 17, 2014, Veolia Transportation who manages New Orleans RTA envisions light rail or express bus service to the airport. http://www.nola.com/politics/index.ssf/2014/07/new_orleans_rta_unveils_35_bil.html

Transportation with Personal Vehicles:

A route that connects New Orleans to Jefferson Parish was voted as the nation’s 30th worst corridor by the Daily Beast in its article entitled “America’s 50 Worst Commutes”. The specific route encompasses I-10 Westbound at the Causeway Blvd. /Exit 228 through West End Blvd./Florida Blvd. Regarding the creation of exit-only lanes on this route in an attempt to alleviate congestion, Chris Morvant, a state transportation engineer, stated that “the idea is to separate traffic according to where people want to go and eliminate the need to try to merge over, which slows things down, especially in heavy traffic.” <http://www.thedailybeast.com/articles/2011/03/08/50-worst-commutes-americas-highways-to-hell.html>

In addition to the congestions on I-10 going towards Metairie, RPC has been also trying to alleviate congestion going on I-10 towards the Westbank by installing ramp meters along Pontchartrain Expressway, according to a July 2016 Times Picayune article. “The meters are designed to reduce traffic congestion, improve travel time and ensure safer merging”, DOTD Secretary Shawn D. Wilson said. He said in a released statement the technology would allow for goods and services to be “delivered in a more efficient and timely manner” more safely during rush hour. However, Iherif Ishak, a civil engineering professor at Louisiana State University, recommended more research to figure out “the nature of the congestion problems” in New

Orleans, to ensure that ramp meter strategies work.http://www.nola.com/traffic/index.ssf/2016/07/new_orleans_ramp_meters_set_to.html

d. Low Poverty Exposure Opportunities

- i. Describe any disparities in exposure to poverty by protected class groups.

In New Orleans, the protected class with the most exposure to poverty is the black, non-Hispanic race. Their exposure is extremely high with a score of 18.23 where the higher the score, the less exposure to poverty. Dissimilar to the black population, the white population has a score of 53.52 showing much less exposure to poverty and even the Hispanic, Asian, and Native American populations have much less exposure to poverty than blacks. HUD Table 12 indicates the disparities in exposure to poverty by protected class as follows:

- Black, Non-Hispanic population highest exposure to poverty at 18.23.
- Native American Non-Hispanic mid-ranged exposure to poverty at 30.75.
- Hispanic population mid-ranged exposure to poverty at 31.10.
- Asian or Pacific Islander, non-Hispanic mid-ranged exposure to poverty at 33.81.
- White, Non-Hispanic population least exposure to poverty at 53.52.

The region is consistent with the New Orleans metropolitan area.

- ii. What role does a person's place of residence play in their exposure to poverty?

According to an article published by the Metropolitan Policy Program at Brookings entitled: "Concentrated poverty in New Orleans 10 years after Katrina", the share of the city's poor residents living in neighborhoods of extreme poverty dropped from 39% in 2000 to 30% in 2009-13. This drop in poverty is partly attributed to the drop in population after Hurricane Katrina of African-Americans unable to return home after the storm. The Brookings study concentrates on data from the American Community Survey and the Geolytics Neighborhood Change data base reporting that there are many very poor neighborhoods in New Orleans and that in 2009-2013, 38 of the city's 173 census tracts had poverty rates exceeding 40%, down only slightly from 41 census tracts in 2000. These neighborhoods were slower to rebuild as a result of Hurricane Katrina.

To examine the disparities in exposure to poverty further, information from the GNO Data Center research shows that the geographies of poverty in New Orleans follow a consistent pattern that is neighborhood specific and consistent with the R/ECAPs identified in Map 14. Poverty indicators of neighborhoods with a majority African-American population in R/ECAP areas are consistent with geographic patterns that also display low-income, low-educational attainment, less access to transportation, and high rent cost-burden. In addition, Hurricane Katrina revealed disparities in exposure to poverty among those in the protected classes. African-American low-income people living in parts of New Orleans that were flood prone, such as the upper and lower-ninth ward, seventh ward, gert town, mid-city and New Orleans East experienced total loss of property, as well as challenges returning home after the storm. Prior to the storm, these areas were considered concentrated areas of poverty, resulting in a real challenge to create access to opportunities for these distressed neighborhoods.

- iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

HUD Table 12 indicates the following:

The racial/ethnic groups most affected by these poverty indicators are Black, Non-Hispanic with a very low score of 14.40 of the population below the federal poverty line, as compared to White, Non-Hispanic with a very high score of 47.33. Also, on a regional level the group most affected by poverty indicators are Black, Non-Hispanics with a low score of 26.51, as compared to White, Non-Hispanic with a high score of 56.49.

The national origin group most affected by these poverty indicators are Honduran residents who live mostly in areas with a poverty index of 0 to 10.

HUD Table 12 also shows that families where 60% or more of the households have children tend to be more likely to live in areas with high exposure to poverty. In addition, the Data Center reports that the child poverty rate in New Orleans is fully 17 percentage points higher than the national average. Thirty-nine percent of New Orleans children live in poverty. Moreover, it is higher than in many comparable U.S. cities. Among the 39 cities with populations between 275,000 and 600,000, New Orleans has the 9th highest child poverty rate. http://www.datacenterresearch.org/reports_analysis/new-orleans-kids-working-parents-and-poverty/

- iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

From a review of HUD data and local data the following assessments were made:

A jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas through leveraging zoning laws restricting certain housing developments in specific neighborhoods. By restricting pre-fabricated housing and multi-family dwellings, particularly public housing projects in middle and upper-middle income neighborhoods, the protected class groups have less opportunity to gain access in low poverty areas. In addition, there are many neighborhoods in New Orleans that are classified as historic districts. Adhering to housing preservation regulations in historic neighborhoods can often be too costly for low income residents to afford.

Due to significant investment in downtown urban areas, many groups with means are returning to downtown living which creates a housing demand that results in increased rents and inflated home values. These policies affect the ability of protected class groups to access low poverty areas because these areas become less affordable as the demand for housing increases in the newly revitalized downtown/inner city areas.

Transportation policies also affect the ability of protected class groups to access low poverty areas. A number of households in need of subsidized Section 8 housing have had to access housing outside of low poverty areas as the increase in rent in those areas resulted in these households having to move to lower rent areas in places like New

Orleans East which has less public transportation services. New Orleans East has less transportation services because transportation policies have been to increase streetcars in downtown areas while failing to increase bus service for remote areas like New Orleans East. In addition, introducing a rail line that has proven to be an economic catalyst and that would bring families from those areas into low poverty areas such as downtown have not been a part of any transportation plan. Therefore, without a car, families in these areas are hindered from accessing areas of low poverty.

Lack of mobility programing or Small Area FMRs at HANO impede voucher holders ability to access lower-poverty neighborhoods.

Conversely, development of HANO scattered sites in high-opportunity neighborhoods will allow protected classes to access lower-poverty neighborhoods.

Public investments in gentrifying neighborhoods without complementary investments in affordable housing make it harder for protected classes to stay in neighborhoods as they become lower-poverty.

e. Environmentally Healthy Neighborhood Opportunities

- i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

The Environmental Health Index provided by the HUD Table 12 and Map 15 measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by specific neighborhoods in New Orleans.

In New Orleans, the access to environmentally healthy neighborhoods is about the same for white, black, Hispanic, and Native American populations. All of these populations have high exposure to carcinogenic, respiratory and neurological toxins as indicated by the low scores on the HUD Environmental Health Index as follows:

White - 27.22

Black - 26.92

Hispanic - 26.89

Native American – 25.37

The Asian Pacific Islander population based on the HUD index has less exposure than other populations in New Orleans with a score of 37.27.

In addition to the HUD Environmental Health Index that indicates exposure to air quality toxins, New Orleans residents also encounter additional environmental health hazards such as elevated highways, lead in the soil, industrial plants, and waste sites.

- **Lead:** New Orleans has also been found to have a high prevalence (61%) of lead above recommended levels in soil and dust samples in and around residences. This information was obtained from a cross sectional study done by Louisiana researchers to assess the distribution of residential soil and dust lead 2 years post Katrina and compared soil lead before and after Katrina. One hundred nine households were enrolled; 61% had at least

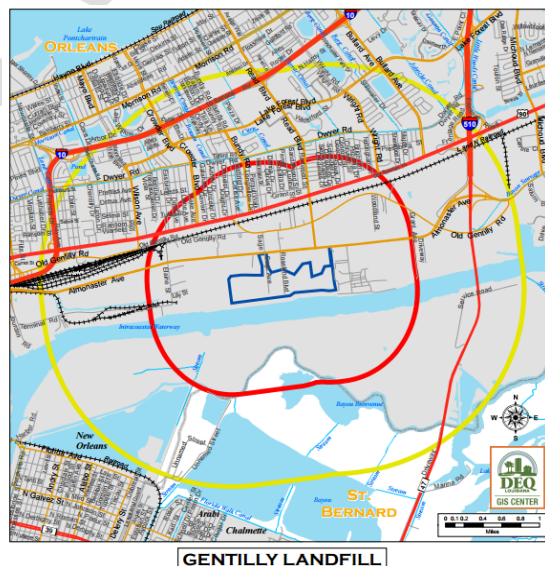
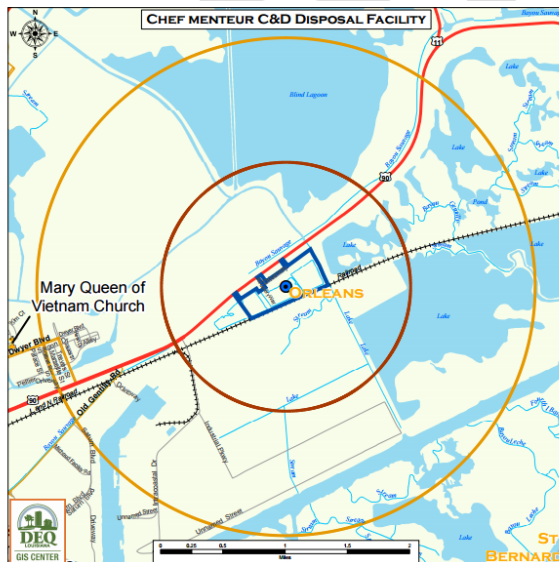
one lead measurement above federal standards. Of homes with bare soil, 47% had elevated lead and 27% had levels exceeding 1,200 ppm. Housing age was associated with soil lead, and housing age and soil lead were associated with interior lead. Race, income, and ownership status were not significantly associated with either interior or exterior lead levels. The median soil lead level of 560 ppm was significantly higher than the median level of samples collected before Hurricane Katrina. See "Environmental Lead after Hurricane Katrina" in volume 120 on page a188 (<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3346792/>).

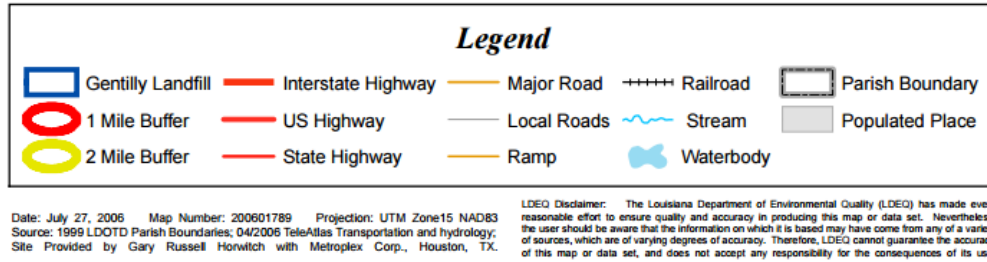
- Elevated Highways:** An organized preservation effort led to the 1969 defeat of a six-lane elevated riverfront expressway proposed for the Vieux Carré. The preservation community feared that an above-grade roadway would harm the Vieux Carré's historic character and permanently sever its relationship to the river.

<http://architecture.tulane.edu/preservation-project/timeline-entry/956> However, the elevated expressway was erected in the historically black neighborhood of Tremé above Claiborne Avenue. This was the central business corridor of the Treme neighborhood, a historic black and creole neighborhood with roots beginning in the 18th century. The construction of the expressway removed the character of the oak-lined corridor. In the following decade, registered businesses along Claiborne Avenue decreased by 50%. The Treme neighborhood, once a center of jazz and African-American culture, began a steady decline. Cement parking lots replaced the public greenspace underneath the expressway.

<https://reclaimingoldwestbroad.org/case-studies/new-orleans-claiborne-expressway/>
- Toxic Waste:** The below maps depict landfills in New Orleans that are in close proximity to neighborhoods.

<http://www.deq.louisiana.gov/portal/NEWS/HurricaneInformation/ChefMenteurandGentillyLandfill.aspx>





- ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Environmental Health Index provided by HUD Table 12 shows disparities in access to environmentally healthy neighborhoods by protected class groups for the total population of New Orleans. A higher score indicates greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).

- Native American, Non-Hispanic at 25.37 have the least access to environmentally healthy neighborhoods.
- Hispanic population also has low access to environmentally healthy neighborhoods at 26.89.
- Black, non-Hispanic has the third lowest access to environmentally healthy neighborhoods at 26.92
- White, non-Hispanic is fourth at 27.22 indicating greater access to environmentally healthy neighborhoods.
- Asian or Pacific Islander, Non-Hispanic has the greatest access to environmentally healthy neighborhoods with a score of 37.27.

HUD Map 15 shows the Environmental Health Index of the R/ECAPS of mostly the inner-city neighborhoods.

f. Patterns in Disparities in Access to Opportunity

- i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

From reviewing and analyzing data, it is clear that the black population continues to have the most exposure to poverty, continues to have failing schools in their neighborhoods, and is among the top three groups that have the most exposure to environmental hazards placed in their communities. In addition, the black community ranks second to last in access to transportation, behind the Asian population which has the least access to transportation.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

Access to Healthcare

Large disparities in health exist between different groups of people in New Orleans. A report developed by the New Orleans Health Department in 2010 examined racial health disparities between African Americans and whites during the period of 2008-2010. The report found the following disparities:

- African Americans in New Orleans were 1.37 times more likely to die than whites in New Orleans over the period of 2008-2010. This ratio was higher in New Orleans over this period than in Louisiana and the United States as a whole, which means that New Orleans has a more severe disparity in all-cause mortality between whites and African Americans than both the state and the nation.
- African Americans were eight times more likely to die of homicide than whites in Orleans Parish during this period.
- African Americans were three times more likely to die of diabetes and twice as likely to die of kidney disease and HIV.
- African American children under 18 in New Orleans are about three and a half times more likely to be uninsured than white children.
- African Americans ages 18-64 were nearly twice as likely to be uninsured than white adults.

<http://www.nola.gov/nola/media/Health-Department/Publications/Health-Disparities-in-New-Orleans-Community-Health-Data-Profile-final.pdf>

There is a 25.5 year difference between the ZIP codes in New Orleans with the highest and lowest life expectancies. A 2012 study published by the Joint Center for Political and Economic Studies' Place Matters Project examined the impact of place on health in Orleans Parish. They collected ZIP code level data and calculated life expectancies for each area, finding a 25.5 year disparity between the ZIP codes with the highest and lowest life expectancies. ZIP code 70112, containing parts of the Tulane, Gravier, Iberville and Treme neighborhoods, had a life expectancy of 54.5. This is lower than the Democratic Republic of the Congo. ZIP code 70124, containing the Lakeshore, Lake Vista, Lakeview, West End, Lakewood and Navarre neighborhoods, had a life expectancy of 80, similar to the UK and higher than the US average in 2012.

<http://jointcenter.org/docs/New%20Orleans%20CHERReport.pdf>

Access to Financial Services

Anecdotal information from community members indicates that the ability to secure loans for homes and businesses is one of the reasons that they are unable to locate in low poverty areas or have better transportation options. Among significant findings of the 2010 City's Analysis of Impediments (AI) report was the section on denial rates of owner-occupied home purchase applications. In New Orleans from 2002-2007, there was an average loan denial rate of 22%. The most common reason for denial was credit history and debt-to-income ratio. Whites had a denial rate of 13%, Hispanics' a denial rate of 28%, and African Americans a denial rate of 30%. The disparity among races prevailed even when income was taken into account. The AI report states that "White applicants with incomes below \$15,000 were denied 25% of the time, while black applicants in the same income range were denied 55% of the time. For applicants with incomes above \$75,000, whites had a denial rate of 10% and blacks had a denial rate of 27%. The 2010 AI Report cited a HUD study that showed in New Orleans, the majority of housing complaints were related to discrimination in terms of conditions, especially in the rental market. This data paints a vivid picture of the housing and community development needs in New Orleans and the challenges faced as the city moves forward to address these needs for our protected class residents. In addition, the Kirwin Institute indicates in its 2010 report, "Credit and Lending in Communities of Color", that consumers of color disproportionately pay more for auto financing, credit cards, private student loans, payday lending, car title loans and others.

<http://kirwaninstitute.osu.edu/my-product/credit-and-lending-in-communities-of-color/>

Regarding national origin protected groups, from a study on immigrant banking completed in 2015 by the Appleseed Foundation, the following was found:

- Thirty-three percent of the banks and credit unions surveyed indicated that lack of bilingual personnel or having a language barrier was a problem. Uncertainty about government regulations, specifically the Patriot Act requirements and proof of identification, created obstacles for 50 percent of participants.
- One institution listed determining credit history of immigrants as a particular issue while two others recognized that many people in the Latino community distrust mainstream institutions.
- Lack of locations in Latino-populated areas created barriers for three institutions.

<http://appleseednetwork.org/wp-content/uploads/2015/10/LA-Appleseed-Immigrant-Banking-Report1.pdf>

- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

New Orleans has enacted policies aimed at providing more access to quality schools by issuing that any child can attend any public school in the City, even if that school is not within the child's neighborhood. Although this policy on its face provides broader access, in practice, only the families that have the ability to transport children to schools outside of neighborhoods to attend these schools or families that feel comfortable with children having to leave extremely early on a bus and get home late, can take advantage of this citywide access policy.

Regarding healthcare, federal policies that provide broader access to health insurance may lessen the access to healthcare gap. However, the program has only been in existence for a short period which means its effect on lessening disparities would not be readily apparent. There was also public opposition to the full proposal of having a public option which would have provided greater access to insurance.

The City of New Orleans also considered transportation options that would provide more access to families with children and other protected classes in accessing low cost and quality transportation while reducing environmental hazards. The City considered removing the elevated I-10 expressway from the majority African-American neighborhood of Treme to (1) provide more bus access and bike lanes so families without cars can access low cost transportation; (2) reduce air and noise pollution from the elevated expressway; and (3) increase economic development activities on a once thriving African-American commercial corridor. This proposal has not been implemented due to opposition from a major industry, the Port of New Orleans, and opposition from the public due to fear that the removal would affect evacuation routes.

In addition, the City of New Orleans has created a NOLA for Life program to assist African-American males. This program focuses on assisting those with a criminal background have access to alternative activities, jobs, and community resources.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

Factors are discussed in answers 1 and 2 above.

iv. Disproportionate Housing Needs

1. Analysis

- a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Race/Ethnicity

According to HUD Table 9 (Demographics of Households with Disproportionate Housing Needs), the black population experiences higher rates of housing cost burden, overcrowding, and substandard housing as compared to other groups. The Hispanic population also experiences higher rates of housing problems than other groups.

Disproportionate Housing Needs	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction		
	# with problems	# households	% with problems
Households experiencing any of 4 housing problems*			
Race/Ethnicity			
Black, Non-Hispanic	42,965	80,175	53.59
Hispanic	3,185	6,725	47.36
Other, Non-Hispanic	835	1,769	47.20
Native American, Non-Hispanic	129	349	36.96
White, Non-Hispanic	18,685	51,315	36.41
Asian or Pacific Islander, Non-Hispanic	1,093	3,498	31.25
<i>Total</i>	<i>66,920</i>	<i>143,850</i>	<i>46.52</i>

According to HUD Table 10 (Demographics of Households with Severe Housing Cost Burden), the African-American population experiences the most severe housing cost burden with 31% of its population experiencing severe housing cost burden.

Family Status

According to HUD Table 9 (Demographics of Households with Disproportionate Housing Needs), family households with 5+ people experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other family households.

Disproportionate Housing Needs	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction		
	# with problems	# households	% with problems
Households experiencing any of 4 housing problems*			
Family households, <5 people	26,870	66,915	40.16
Family households, 5+ people	5,840	10,150	57.54
Non-family households	34,205	66,780	51.22

- b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

From a review of HUD Map 7, the following areas in the jurisdiction experience the greatest housing burdens:

- New Orleans East area between I-10 expressway and Morrison road and bound by Read Boulevard. This area is a RE/CAP area where the predominant race is African-American.
- The 7th ward area bound by N. Claiborne (I-10 expressway) and N. Galvez and Allen Street and Elysian Fields Avenue. This area is a R/ECAP within a R/ECAP area where the predominant race is African-American.
- The 7th ward area bound by Esplanade Avenue and Elysian Fields and Law Street and St. Claude Avenue. This area is a R/ECAP area where the predominant race is African-American.
- The Mid-City area bound by N. Claiborne (I-10 expressway) to N. Carrollton and Conti and Canal Street. This area is a R/ECAP area where the predominant race is African-American.
- The area bound by Washington Avenue to Earhart Expressway and Toledano and Joliet Street. This area is a R/ECAP area where the predominant race is African-American.
- The area bound by N. Claiborne (I-10 expressway) and N. Broad Street and Esplanade Avenue to St. Philip Street. This area is not a R/ECAP but the predominant race is African-American.
- The area bound by N. Claiborne Avenue and N. Peters and Charbonnet Street to St. Bernard Parish line. This area is not a R/ECAP but the predominant race is African-American.
- The area bound by N. Claiborne (I-10 expressway) to Jefferson Davis Parkway and St. Louis Street to Banks Street. This area is a R/ECAP area where the predominant race is African-American.
- The Central City area bound by O.C. Haley Boulevard and Simon Bolivar Blvd and 1st Street and Toledano Street. This area is a R/ECAP area where the predominant race is African-American.

- The Central City area bound by Simon Bolivar Blvd and S. Claiborne Avenue and 1st Street and Louisiana Avenue. This area is not R/ECAP area but the predominant race is African-American.
- The area on the Westbank bound by US 90 expressway and Behrman Place and General DeGaulle Drive and Jefferson/Orleans Parish line. This area is not a R/ECAP area where the predominant race is African-American.

In the region, the primary areas with the greatest housing burden are as follows:

- The area on the Westbank bound by Westbank Expressway and 5th Street and Orleans/Jefferson Parish line and Stumpf Boulevard. This area is not R/ECAP area but the predominant race is African-American.
- The Bayou Segnette and Jean Lafitte areas also have high housing burdens.

- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

According to HUD Table 9 (Demographics of Households with Disproportionate Housing Needs), approximately 58% of households with 5+ people, 5,840 people out of 10,150 people, experience severe housing problems. Approximately 24% of these people (2,430) experience severe housing cost burdens.

Although New Orleans has approximately 5,840 households with 5+ people with housing problems and who are in need of more than one bedroom, over a 5 year period the total new construction for 2 to 4 family rentals was only 990. The total of new construction for a 5+ family is even less with only 532 new construction permits being issued for over a 5 year period.

Building Permits for New Construction 2010 – 2014

<http://www.noraworks.org/images/NORA-Rental-Housing-Report.pdf>

	1 FAMILY	2 TO 4 FAMILY	5+ FAMILY	TOTAL
2010	820	177	83	1,080
2011	717	273	104	1,094
2012	690	228	46	966
2013	736	133	26	895
2014	574	179	273	1,026
Five Year Total	3,537	990	532	5,061
Annual Average	707.4	198	106.4	1,012.2

Source: Bureau of the Census, <http://censtats.census.gov/bdgb/bdgbgmt.shtml>

- d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

According to a study commissioned by the New Orleans Redevelopment Authority and published on March 2016 entitled “Where will People Live: New Orleans Growing Housing

Challenge” and prepared by the Center for Community Progress (<http://www.noraworks.org/images/NORA-Rental-Housing-Report.pdf>), 55% or 86,000 of all New Orleans households were renters in 2013. African-Americans comprised 58% of renters, compared to 49% of white households. In addition, according to HUD’s 2015 Comprehensive Assessment Survey (CHAS), in 2015 Orleans Parish had 143,850 households and of these households, 48% or 68,505 were owner occupied. Renter households in 2015 were around 52% or 75,345 households.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

The following information is data provided by the March 2016 report Where will People Live: New Orleans Growing Housing Challenge” and prepared by the Center for Community Progress (<http://www.noraworks.org/images/NORA-Rental-Housing-Report.pdf>):

Family Status

According to the March 2016 report, 60% of all renter households in New Orleans are non-family households, while 49% are single individuals, compared to 47% and 36% of renter households respectively nationwide. One-third of renter households nationally have children under 18 in the home, compare to roughly one-fifth of New Orleans renter households. The table below shows a strong trend in New Orleans’ rental market away from both married couple and female-headed families toward single individuals and other non-family households.

Table – Renter Households by Type and Presence of Own Children 2000 and 2013

	2000		2013		CHANGE 2000-2013
	number	% of all renters	number	% of all renters	
Married Couples	17,116	17.0%	11,265	13.0%	- 34.2%
with own children <18	8,419	8.4	4,113	4.8	- 51.1
Female-Head Family	30,055	29.8	19,714	22.8	- 34.4
with own children <18	20,464	20.3	11,672	13.5	- 43.0
Other Family	4,652	4.6	3,789	4.5	- 18.6
Non-Family Household	48,893	48.5	51,585	59.7	+ 5.6
Single individual	40,198	39.9	42,046	48.7	+ 4.6
Other non-family household	8,695	8.6	9,539	11.0	+ 9.7
TOTAL	100,716	100%	86,353	100%	- 14.3%

SOURCE: 2000 Census; 1 year 2013 American Community Survey

Age of Renters and Homeowners

Thirty-six percent of New Orleans’ renters are under 35, compared to 11% of its homeowners. Twenty-eight percent of homeowners are 65 or over, compared to 11% of

renters being 65 and over which is less than the national percentage of 14%. In addition, of the households 65 and over, 70% are homeowners.

Socioeconomic Status of Renters and Homeowners

In New Orleans the median income of tenants is only 42% of the median for homeowners, compared to 48% nationally. Householders earning under \$20,000 are disproportionately renters, while households earning over \$50,000 are disproportionately likely to be homeowners. 43% of all renters have annual total household incomes of less than \$20,000. The table below depicts the disparities.

Table – Income Distribution of Households

	OWNERS	RENTERS	TOTAL	INCOME DISTRIBUTION		% HOUSEHOLDS THAT ARE RENTERS
				Owners	Renters	
0 to \$9,999	4,848	17,946	22,794	6.9%	22.9%	78.7%
\$10,000 to \$19,999	7,020	15,719	22,739	10.0%	20.1%	69.1%
\$20,000 to \$34,999	9,799	15,819	25,618	14.0%	20.2%	61.7%
\$35,000 to \$49,999	9,044	9,827	18,871	12.9%	12.6%	52.1%
\$50,000 to \$74,999	12,340	9,298	21,638	17.6%	11.9%	43.0%
\$75,000 to \$99,999	8,496	4,306	12,802	12.1%	5.5%	33.6%
\$100,000 or more	18,628	5,308	23,936	26.5%	6.8%	22.2%
TOTAL	70,175	78,223	148,398	100%	100%	
MEDIAN	\$57,408	\$24,339	\$37,146			

SOURCE: Five-year 2009-2013 American Community Survey

- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Please see the Housing Needs Analysis table from the Housing Authority of New Orleans PHA Plan for fiscal year beginning October 1, 2016 on the following pages. This table analyzes low-income renter households.

<p style="text-align: center;">HOUSING AUTHORITY OF NEW ORLEANS HOUSING NEEDS STATEMENT: FY 2017 PHA ANNUAL PLAN</p>			
<p style="text-align: center;">HUD 2015 COMPREHENSIVE HOUSING ASSESSMENT SURVEY (CHAS) USING U.S. CENSUS AMERICAN COMMUNITY SURVEY (ACS) 2008-2012 DATASETS</p>			
Total Orleans Parish Households	143,850		
Owner Households	68,505 (48% of Total)		
Renter Households	75,345 (52% of Total)		
<p style="text-align: center;">Orleans Parish Renter Households by Average Median Income (AMI) With Breakout of "Low Income Renter" Households</p>			

Extremely Low Income renter households (<=30% AMI)	23,510		
Very Low Income renter households (>30% but <=50% AMI)	12,930		
Low Income renter households (>50% but <=80% AMI)	13,055		
Subtotal "Low Income Renter" Households (<=80% AMI)	49,500	49,500	Of the total 75,345 or 66% are classified as Low Income
Other renter households (>80% but <=100% AMI)	5,635		
Other renter households (>100% AMI)	20,215		
Subtotal Other Renter Households (>80% AMI)	25,850		
Total Renter Households:	75,345		
Low income renter households with moderate to severe housing cost burden (of total 49,500)		37,130	Of all 49,500 "Low Income" households, 75% are Cost Burdened
Low income renter households with housing problems (of total 49,500)		38,025	Of all 49,500 "Low Income" households, 77% have Housing Problems
Low Income "Elderly Renter" Households			
Low income elderly renter households with at least one member 62 years and older (of total 49,500)		8,140	Of all 49,500 "Low Income" households, 16% are Elderly Households
Low income elderly renter households with housing problems (of total 8,140)		5,780	Of all 8,140 "Low Income" elderly households, 71% have Housing Problems
Low Income "Disabled Renter" Households			
Low income disabled renter households experiencing housing problems where at least one household member has a hearing or vision impairment (of total 5,615)		4,150	Of all 5,615 "Low Income" disabled households, 74% have Hearing or Vision Impairment Problems
Low income disabled renter households experiencing housing problems where at least one household member has an ambulatory limitation (of total 8,175)		6,195	Of all 8,175 "Low Income" disabled households, 76% have Ambulatory Limitations
Low income disabled renter households experiencing housing problems where at least one household member has a cognitive limitation (of total 6,470)		4,720	Of all 6,470 "Low Income" disabled households, 73% have Cognitive Limitations
Low income disabled renter households experiencing housing problems where at least one household member has a self-care or independent living limitation (of total 5,670)		4,295	Of all 5,670 "Low Income" disabled households, 76% have Self-Care or Independent Living Limitations
Low Income Renter Households by "Race/Ethnicity"			
White Low income renter households experiencing housing problems (of total 9,970)		7,795	Of the total 9,970 White Low Income households, 78% have housing problems
Black Low income renter households experiencing housing problems (of total 35,555)		27,300	Of the total 35,555 Black Low Income households, 77% have housing problems

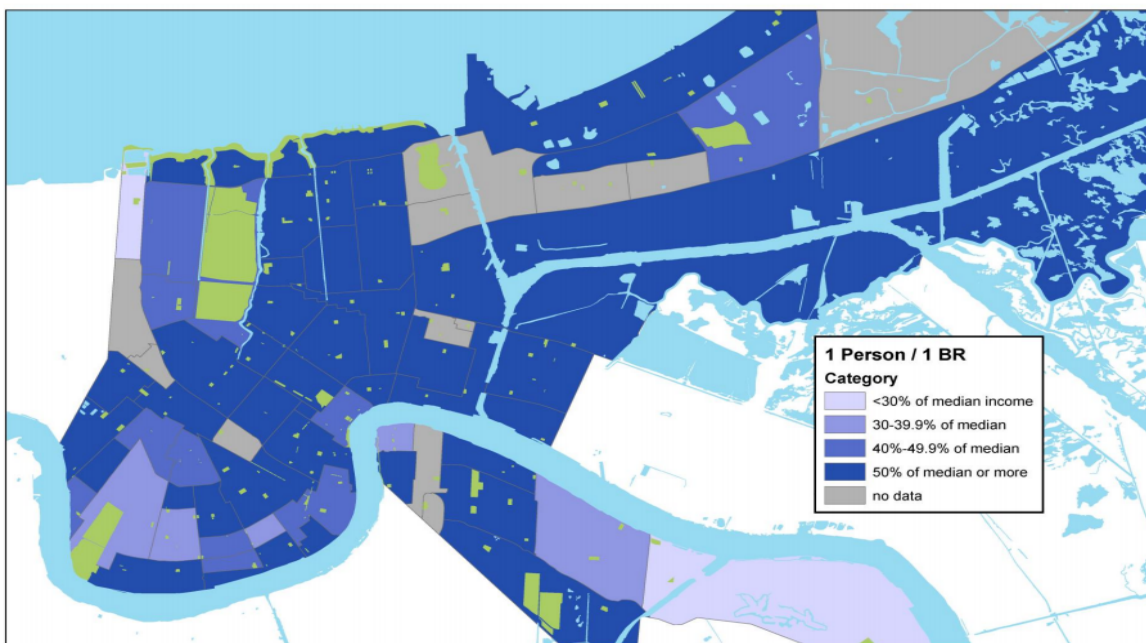
Asian Low income renter households experiencing housing problems (of total 914)	614	Of the total 914 Asian households, 614 have housing problems
Hispanic Low income renter households experiencing housing problems (of total 2,360)	1,850	Of the total 2,360 Hispanic households, 1,850 have housing problems or 78% have housing problems
Other Low income renter households experiencing housing problems : includes American Indians, Pacific Islanders, & Multi-Racial Households (of total 695)	460	Of the total 9,970 Other households, 460 have housing problems or 78% have housing problems
COST BURDEN: Moderate cost burden is "rent comprising more than 30 percent of income". Severe cost burden is "rent comprising more than 50 percent of income".		
HOUSING PROBLEMS: A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS data: 1) household lacks complete plumbing facilities; 2) household lacks complete kitchen facilities; 3) household is overcrowded; and 4) household is cost burdened.		

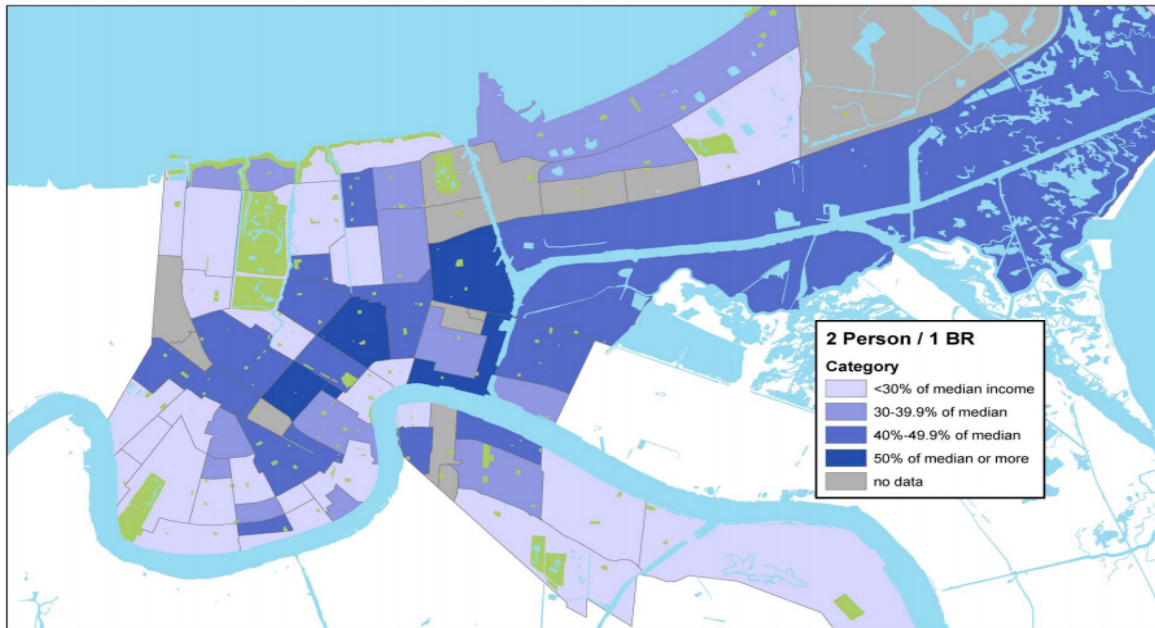
3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

The availability of affordable units in a range of sizes

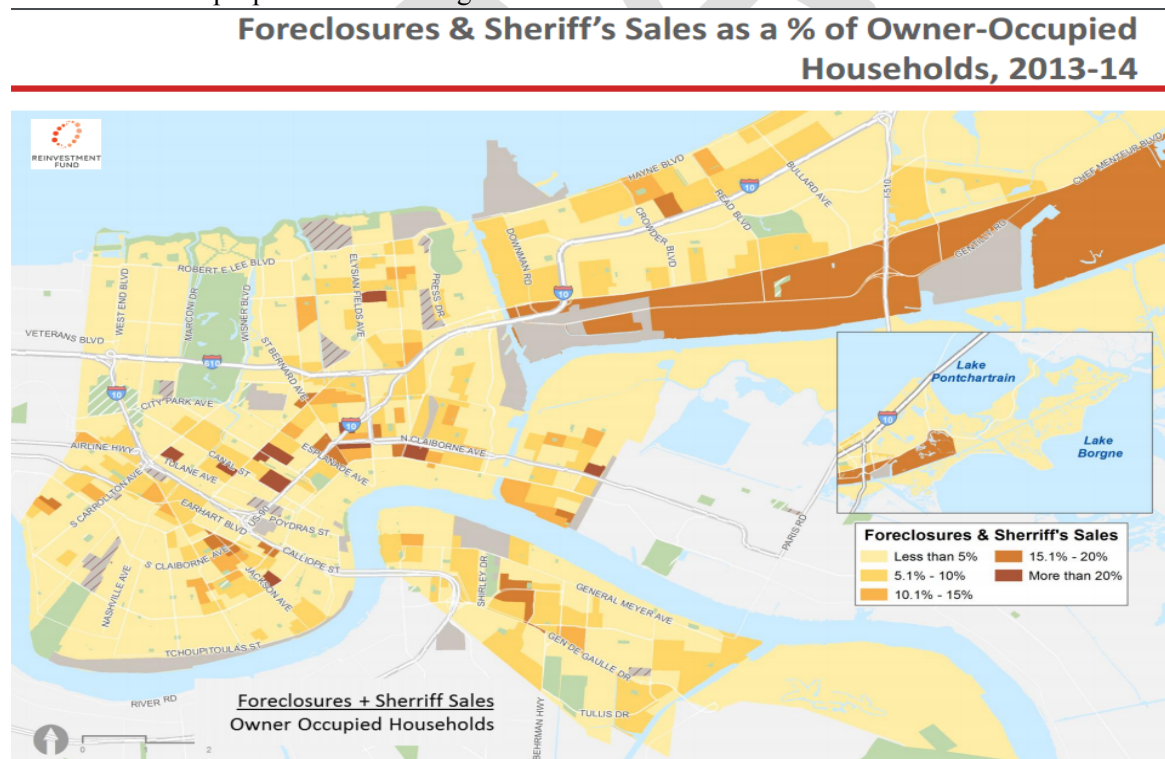
The below map taken from the March 2016 report "Where will People Live: New Orleans Growing Housing Challenge" and prepared by the Center for Community Progress provides a snapshot of the growing issue surrounding lack of affordable housing in New Orleans and how it is a contributing factor to disproportionate housing needs. The maps show that in many areas residents are paying 50% or more of median income.



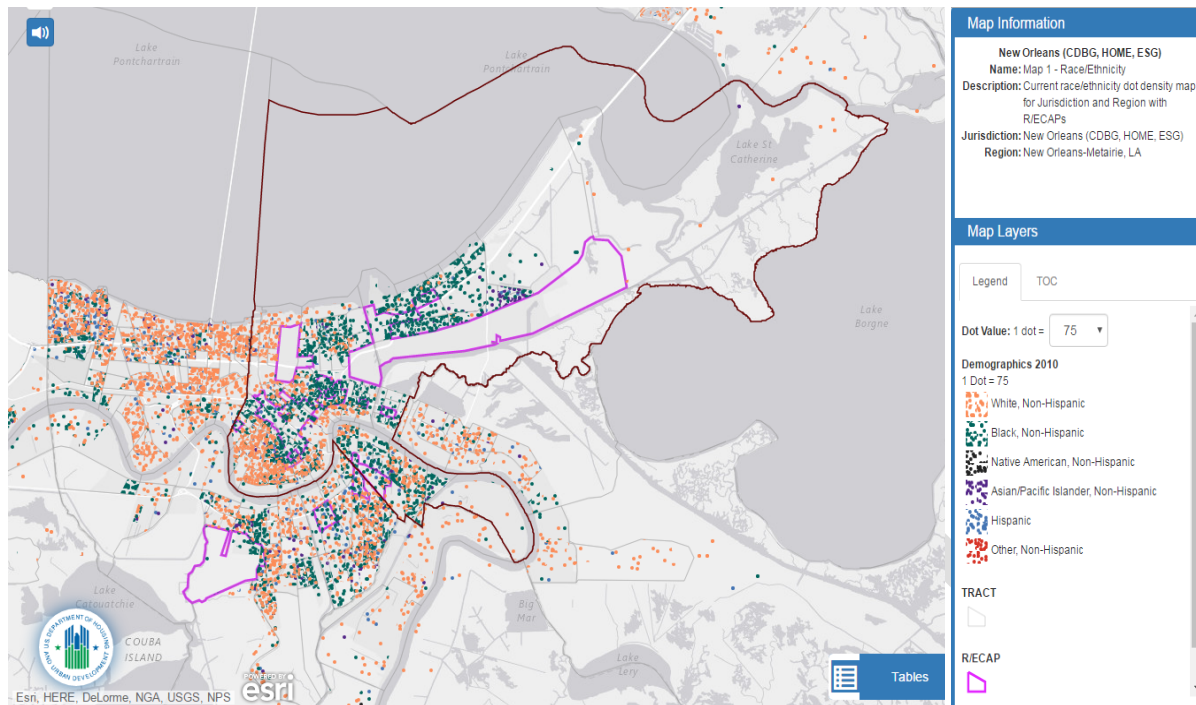


Displacement of residents due to economic pressures

The below map captured from the March 2016 “Market Value Analysis – New Orleans” completed by the Reinvestment Fund details the percentage of foreclosures in New Orleans. The map shows a correlation between neighborhoods with high foreclosures and R/ECAP areas which displace residents and contributes to disproportionate housing needs.



HUD MAP 1 – Race/Ethnicity and Concentrated Areas of Poverty 2010



C. Publicly Supported Housing Analysis

1. Analysis:

a. Publicly Supported Housing Demographics

- i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV)?

HUD Table 6 provides demographic information of residents living in publicly supported housing in the New Orleans jurisdiction. The demographics are sorted by race and ethnicity and categorized into four housing types: Public Housing and Housing Choice Voucher (HCV) Programs which are administered by the Housing Authority of New Orleans (HANO); and Project Based Section 8 and Other Multifamily Housing administered by the U.S. Department of Housing and Urban Development (HUD).

Data excerpted from HUD Table 6 reflects 1,409 Black households (96.37%) residing in New Orleans Public Housing – representing the highest racial/ethnic group. With respect to other racial/ethnic groups, there are 35 Hispanic families (2.39%); 16 (1.09%) White households; and only one (.07%) Asian or Pacific Islander household living in New Orleans Public Housing.

The Public Housing demographics closely resemble the racial/ethnic composition of residents assisted by the HCV Program. According to HUD Table 6, there are 17,603

(95.24%) Black households participating in the Housing Choice Voucher (HCV), which is clearly the largest racial/ethnic group assisted under the HCV Program. Hispanics are ranked second, accounting for 584 (3.16%) households. Whites are ranked third, accounting for 241 (1.30%) households; and Asians or Pacific Islanders are the smallest group of only 30 (0.16%) households. Black households are overwhelmingly the largest racial/ethnic group residing in the New Orleans Public Housing and HCV supported housing at 96.37% and 95.24% respectively.

HUD Table 6 Excerpt - Publicly Supported Housing Residents by Race/Ethnicity								
(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	16	1.09	1,409	96.37	35	2.39	1	0.07
Project-Based Section 8	1,160	28.58	2,280	56.17	420	10.35	184	4.53
Other Multifamily	170	35.79	124	26.11	73	15.37	92	19.37
HCV Program	241	1.30	17,603	95.24	584	3.16	30	0.16

HUD Table 6 also shows that Black households represent the majority of families living in Project-Based Section 8 developments with 2,280 (56.17%) households reported in the dataset. The Project-Based Section 8 counts get progressively smaller with 1,160 (28.58%) White households ranked as the second largest group; Hispanics ranked third with 420 households (10.35%); and Asians or Pacific Islanders ranked last with 184 families (4.53%).

HUD's Other Multifamily Developments represent a small component of the New Orleans publicly supported housing market. In addition, Table 6 shows Whites ranked highest at 170 (35.79%) assisted households; followed by Blacks at 124 (26.11%), Asians or Pacific Islanders at 92 (19.37%); and 73 (15.37%) Hispanics living in HUD's Multifamily housing.

Thus, with respect to race/ethnicity African Americans are the predominant group residing in publicly supported housing in New Orleans. This is the case in three of the four reported housing categories – Public Housing, Housing Choice Voucher, and Project-Based Section 8. Although the Other Multifamily category is significantly smaller than the other three housing types, it exhibits a more diverse distribution with Whites at 35.79%, African Americans at 26.11%, Asians or Pacific Islanders at 19.37% and Hispanics at 15.37%.

- ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

HUD Table 6 provides data on the number of households that meet income eligibility requirements for publicly supported housing. The data is sorted by race and ethnicity and categorized by Area Median Income (AMI) groupings 0-30% AMI, 0-50% AMI, and 0-80% AMI. As indicated earlier, the Public Housing and Housing Choice Voucher (HCV) Programs are administered by HANO; and Project-Based Section 8 and Other Multifamily Housing are administered by HUD. Eligibility for all of these programs is generally limited to families with household income up to 80% AMI.

Table 6 Excerpt – Publicly Supported Housing Residents by Race/Ethnicity									
(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity								
	White		Black		Hispanic		Asian or Pacific Islander		
	#	%	#	%	#	%	#	%	
Income Eligible Households 0-80% of AMI	14,335	19.83%	51,355	71.05%	3,175	4.39%	1,594	2.21%	70,459
Housing Type / Assisted Households	#	%	#	%	#	%	#	%	
Public Housing	16	0.11%	1,409	2.74%	35	1.10%	1	0.06%	
Project-Based Section 8	1,160	8.09%	2,280	4.44%	420	13.23%	184	11.54%	
Other Multifamily	170	1.19%	124	0.24%	73	2.30%	92	5.77%	
HCV Program	241	1.68%	17,603	34.28%	584	18.39%	30	1.88%	
Total Households Living in Publicly Supported Housing by Racial/Ethnic Protected Class Category	1,587	11.07%	21,416	41.70%	1,112	35.02%	307	19.26%	24,423

Data in the above chart, derived from HUD Table 6, highlights the fact that 70,459 New Orleans households are income-eligible for publicly supported housing. The chart also points out that 24,423 (34%) of New Orleans income eligible-households reside in publicly supported housing – with 2.07% residing in Public Housing; 5.74% residing in Project-Based Section 8 developments; .65% living in Other Multifamily Housing; and 26.20% living in HCV-assisted Program.

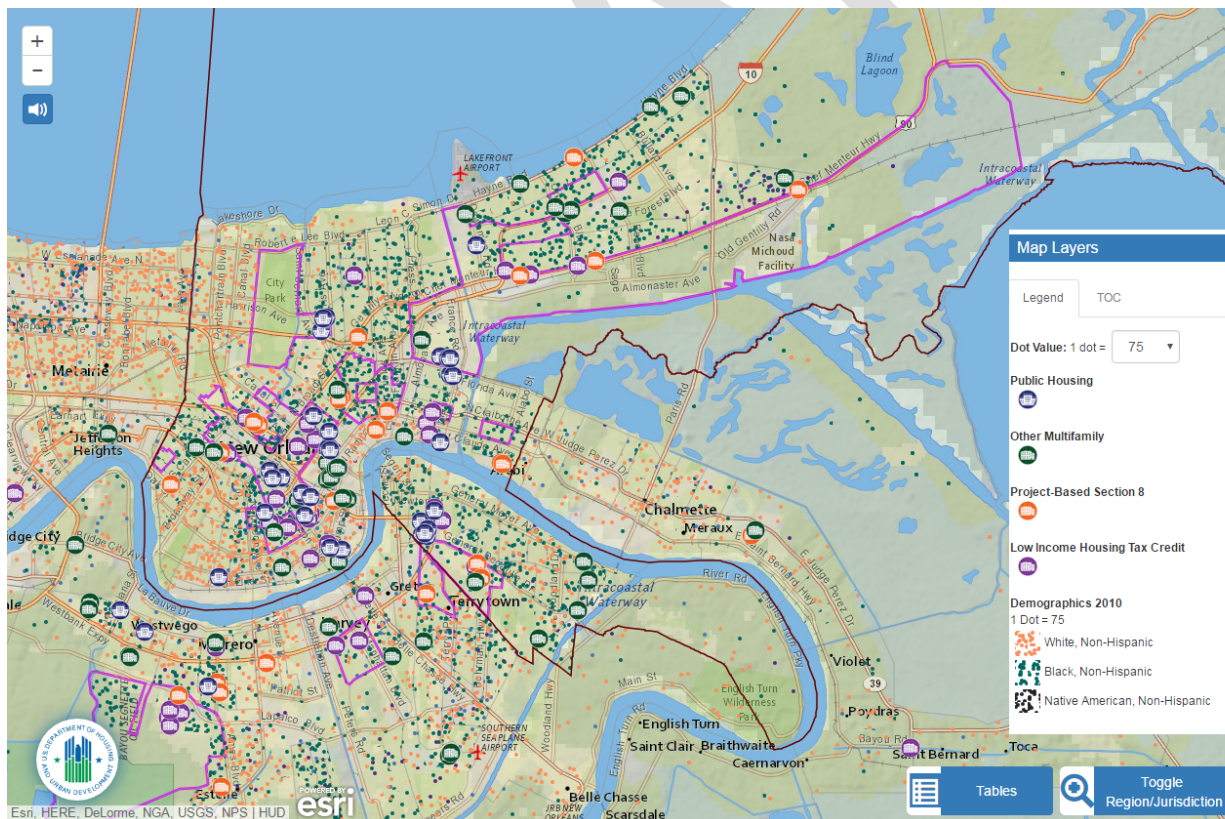
With regard to race and ethnicity, of the 70,459 total households that meet income-eligibility for publicly supported housing 51,355 (71.05%) are Black; 14,335 (19.83%) are White; 3,175 (4.39%) are Hispanic; and 1,594 (2.21%) are Asian or Pacific Islanders. The degree to which these income-eligible households reside in publicly assisted housing is also further quantified in the dataset with 21,416 (41.7%) of the 51,355 income-eligible Black households living in publicly supported housing; 1,587 (11.07%) of the 14,335 income-eligible Whites living in publicly supported housing; 1,112 (35.02%) of income-eligible Hispanics living in publicly supported housing; and 307 (19.26%) of income-eligible Asian or Pacific Islanders residing in publicly supported housing. Thus, income-eligible Blacks have the highest degree of residency in publicly supported housing, followed by income-eligible Hispanics, Asians or Pacific Islanders, and Whites.

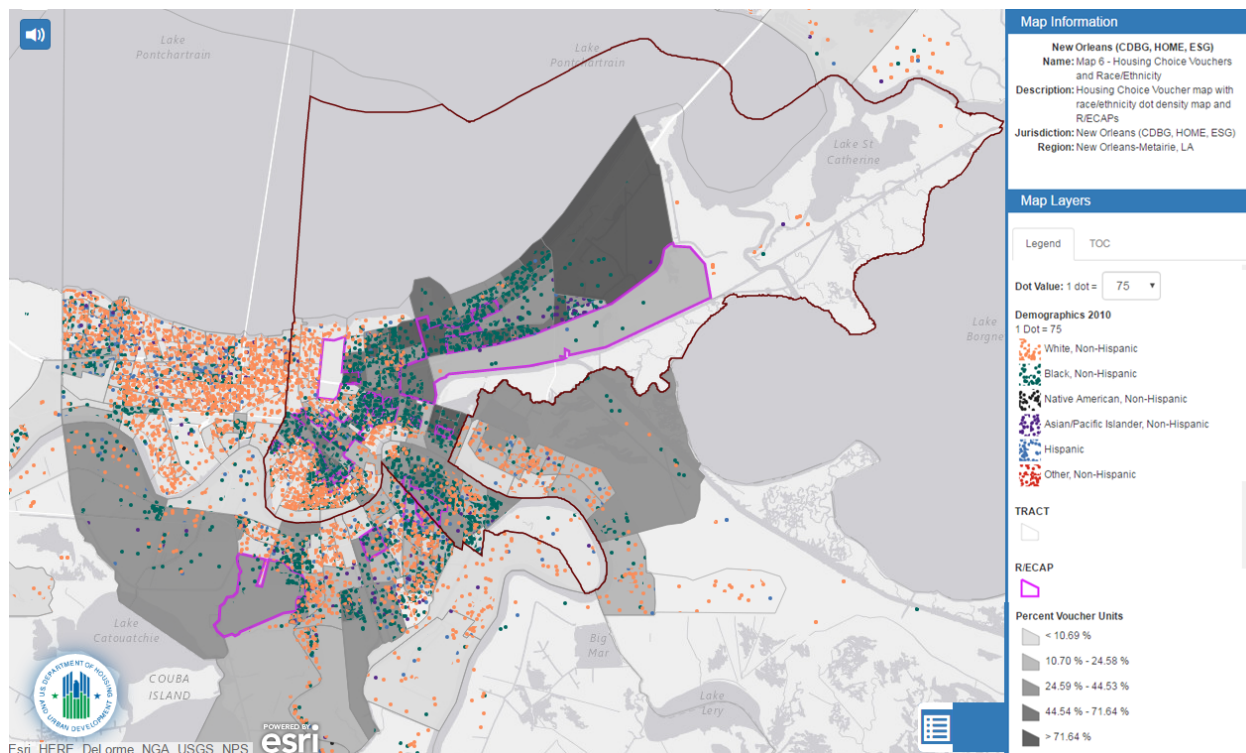
b. Publicly Supported Housing Location and Occupancy

- i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

HUD Map 5 depicts the location of publicly supported housing in the New Orleans jurisdiction. The overlay in Map 5 shows that publicly supported housing types (i.e., Public Housing, Project-Based Section 8, LIHTC, and other HUD Multi-Family assisted development) are largely dispersed in African-American segregated communities. The Map 5 data also shows that these publicly supported housing types are frequently located either within or in close proximity to R/ECAPs. Conversely, Map 5 shows minimal overlay of such publicly supported housing in predominantly White segregated communities.

HUD Map 6 depicts Housing Choice Vouchers with race/ethnicity dot density and R/ECAP overlays. Consistent with Map 5, the Map 6 overlay shows that areas with higher percentages of HCV assisted housing are frequently located in segregated African American portions of the city. Map 6 also shows that areas with lower percentages of voucher units are generally occupied by higher concentrations of White households.





Data found in HUD Table 7 allows for a comparison between R/ECAP and Non-R/ECAP units within four publicly supported housing categories: Public Housing; Project-based Section 8; Other HUD Multifamily; and Housing Choice Voucher (HCV) Program. The findings of this analysis are provided in the table below for each of the four housing categories.

Although HUD Maps 5 and 6 show that publicly supported housing is located throughout the City's R/ECAP areas, Table 7 provides additional information about the extent to which the various types of publicly supported housing is found in Non-R/ECAP areas. Based on the Table 7 data, Public Housing comprises the greatest percentage of units located in R/ECAP areas (84.74%) while the Housing Choice Voucher Program has the lowest percentage of assisted units in R/ECAPs (33.31%). Less than 50% of the Project-based Section 8 and Other HUD Multifamily developments are located in R/ECAPs.

Table 7 Excerpt - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category		
(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% R/ECAP & NON-RECAP
Public Housing		
R/ECAP tracts	1,427	84.74%
Non R/ECAP tracts	257	15.26%
	1,684	
Project-based Section 8		
R/ECAP tracts	1,816	43.90%
Non R/ECAP tracts	2,321	56.10%
	4,137	
Other HUD Multifamily		
R/ECAP tracts	181	36.49%
Non R/ECAP tracts	315	63.51%
	496	
HCV Program		

R/ECAP tracts	6,192	33.31%
Non R/ECAP tracts	12,399	66.69%
	18,591	

- ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

HUD Table 7 reflects 10,704 families with children that reside in publicly supported housing and these families are primarily assisted under the HCV Program (9,612 households) and the Public Housing (701 households) Program. The Table 7 data also shows that there are 6,203 elderly households residing in New Orleans publicly supported housing with the majority of these elderly households living in Project-based Section 8 (2,870) and in HCV-assisted housing (2,336). With respect to disability, Table 7 reflects 5,491 households where at least one member has a disability, and the vast majority of those households (3,898) reside in HCV assisted housing.

Table 7 Excerpt – Demographics on Elderly, Disabled, and Families with Children by Publicly Supported Housing Program Category								
(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)		% Elderly	# Elderly	% with a disability*	# with a disability*	% Families with children	# Families with children
Public Housing	1,684		31.83%	536	36.69%	618	41.64%	701
Project-based Section 8	4,137		69.38%	2,870	22.03%	911	9.46%	391
Other HUD Multifamily	496		92.91%	461	12.75%	63	0.00%	0
HCV Program	18,591		12.56%	2,336	20.97%	3,898	51.70%	9,612
Total Households Living in Publicly Supported Housing by Protected Class Category	24,908		24.90%	6,203	22.04%	5,491	42.98%	10,704
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.								
Note 2: Data Sources: APSH								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

As discussed earlier, the overlay in Map 5 shows that publicly supported housing types (including Public Housing, Project-Based Section 8, LIHTC, and other HUD Multi-Family assisted development) are largely dispersed in African-American segregated communities. The Map 5 data also shows that these publicly supported housing types are frequently located either within or in close proximity to R/ECAPs. Conversely, Map 5 shows minimal overlay of such publicly supported housing in predominantly White segregated communities.

HUD Map 6 depicts Housing Choice Vouchers with race/ethnicity dot density and R/ECAP overlays. Consistent with Map 5, the Map 6 overlay shows that areas with

higher percentages of HCV assisted housing are predominantly located in segregated African American portions of the city. Map 6 also shows that areas with lower percentages of voucher units are generally occupied by higher concentrations of White households.

**Table 7 Excerpt - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category
Elderly, Disabled, and Families with Children**

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	# Elderly	# with a Disability	# Families with Children
Public Housing				
R/ECAP tracts	1,427	520	583	524
Non R/ECAP tracts	257	16	35	178
Project-based Section 8				
R/ECAP tracts	1,816	1,371	510	0
Non R/ECAP tracts	2,321	1,500	402	391
Other HUD Multifamily				
R/ECAP tracts	181	167	22	0
Non R/ECAP tracts	315	294	41	0
HCV Program				
R/ECAP tracts	6,192	900	1,425	2,961
Non R/ECAP tracts	12,399	1,436	2,474	6,651
Total	24,908	6,204	5,492	10,705
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household. Note 2: Data Sources: APSH Note 3: Refer to the Data Documentation for details (www.hudexchange.info).				

According to the above dataset from HUD Table 7, geographic location patterns for publicly supported housing that primarily serves families with children can be identified as follows: The total number of occupied **Public Housing** Units in R/ECAP areas is 1,427, serving the following population: Elderly 36.45%, Disabled 40.87%, and Families with Children 36.69%. In non-R/ECAP areas according to HUD Table 7, there are a total of 257 occupied Public Housing Units serving the following populations: Elderly 6.18%, Disabled 13.51%, and Families with Children 69.11%.

According to HUD Table 7, **Project-Based Section 8** housing in R/ECAPs total 1,816 occupied units assisting the following households: Elderly 75.48%, Disabled 28.07%, and Families with Children 0%. In non-R/ECAP areas, there are 2,321 Project-Based Section 8 occupied units serving the following population: Elderly 64.61%, Disabled 17.30%, and Families with Children 16.86%.

According to HUD Table 7, **Other HUD Multi-Family** in R/ECAPs total 181 occupied units, serving the following population: Elderly 92.22%, Disabled 12.22%, and Families with Children 0%. HUD Multi-Family in Non-R/ECAP areas total 315 occupied units, serving the following population: Elderly 93.31%, Disabled 13.06%, and Families with Children 0%.

According to HUD Table 7, the Housing Voucher Choice (HCV) Program has 6,192 occupied housing units in the R/ECAP areas serving the following populations: Elderly 14.53%, Disabled 23.01%, and Families with Children 47.82%. HCVs in Non-R/ECAP areas total 12,399 total occupied units, serving the following populations: Elderly 11.58%, Disabled 19.95%, and Families with Children 53.64%.

- iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?

The demographic composition of occupants of publicly supported housing living in R/ECAPS compared to the demographic composition of occupants of publicly supported housing living outside of R/ECAPS is as follows:

In **Public Housing**, Black households living in R/ECAPS is reported at 97.01% with 93.39% Blacks living in Non-R/ECAPS. Elderly households residing in R/ECAPS are reported at 36.45% and 6.18% in Non-R/ECAPS. Disabled households living in R/ECAPS are reported at 40.87% and 13.51% in Non-R/ECAPS. Approximately 1.33% of White households reside in R/ECAPS and 0% in Non-R/ECAPS. Also, according to Table 7, 1.49% of Hispanic households reside in R/ECAPS and 6.61% reside in Non-R/ECAPS; and .08% Asian or Pacific Islander families reside in R/ECAPS with none residing in Non-R/ECAPS.

Project-Based Section 8 differences are reflected with the percentage of Elderly households living in R/ECAPS at 75.48% and 64.61% living in Non-R/ECAPS. Disabled households are represented at 28.07% in R/ECAPS and 17.30% in Non-R/ECAPS. Blacks are almost evenly split, with 57.72% living in R/ECAPS and 54.92% living in Non-R/ECAPS. Whites are reported at 30.75% in R/ECAPS and 26.81% in Non-R/ECAPS. The data also reflects 4.17% Hispanic households living in R/ECAPS and 15.37% residing in Non-R/ECAPS.

According to HUD Table 7, **Other HUD Multi-Family** Units occupied in R/ECAP and Non-R/ECAP areas is almost even in all categories. Elderly R/ECAP occupancy is 92.22% and 93.31% in Non-R/ECAPS. Disabled households are reported at 12.22% in R/ECAPS and 13.06% in Non-R/ECAPS. White R/ECAP occupancy is 20.59% and 44.26% in Non-R/ECAP, representing the largest disparity. Black Multi-Family occupancy in R/ECAPS is 22.94% and 27.87% in Non-R/ECAPS. R/ECAP occupancy for Hispanics and Asian or Pacific Islanders residing in Other Multi-Family is unreported, however Non-R/ECAPS occupancy in Other Multi-Family housing is at 9.84% for Hispanics and 12.29% for Asian or Pacific Islanders.

According to HUD Table 7, the **HCV Program** showed close comparisons in demographic percentages for R/ECAP and Non-R/ECAP areas for the following populations: Elderly R/ECAP 14.53% and Non-R/ECAP 11.58%; Disabled R/ECAP

23.01% and Non-R/ECAP 19.95%; White R/ECAP 1.25% and Non-R/ECAP 1.37%; Black R/ECAP 95.70% and Non-R/ECAP 94.99%; Hispanic R/ECAP 2.87% and Non-R/ECAP 3.28%; Asian R/ECAP 0.05% and Non-R/ECAP 0.22%. The percentage of Families with Children was reported at 47.82% in R/ECAPS and 53.64% in Non-R/ECAPS.

Data used in this analysis is charted below in two formats. Part A, derived from HUD Table 7, reflects the *percentage of households* in each category of publicly supported housing sorted by R/ECAP and Non R/CAP areas. The data in Part A was recalculated to reflect the actual *number of households* in each of the respective categories. That dataset, presented in Part B, further quantifies and helps to illuminate several key comparisons of households occupying publicly supported housing in New Orleans. For example:

- The greatest number of White residents lives in Project-based Section 8 housing, with 558 residing in R/ECAPs and 622 residing in Non/RECAPs.
- Project-Based Section 8 is also largely occupied by the Elderly with 1,371 households living in R/ECAPs and 1,500 households living in Non/RECAPs.
- The number of HCV residents living in R/ECAPs is 5,926 compared to 11,778 households in non R/ECAPs.
- HCV Families with children constitute 2,961 households in R/ECAPs and 6,651 households in Non R/ECAPs.

Table 7 Excerpt: PART A - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category
(Reflects "Percentage" of Households)

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
Public Housing								
R/ECAP tracts	1,427	36.45	40.87	1.33	97.01	1.49	0.08	36.69
Non R/ECAP tracts	257	6.18	13.51	0.00	93.39	6.61	0.00	69.11
Project-based Section 8								
R/ECAP tracts	1,816	75.48	28.07	30.75	57.72	4.17		0.00
Non R/ECAP tracts	2,321	64.61	17.30	26.81	54.92	15.37	2.82	16.86
Other HUD Multifamily								
R/ECAP tracts	181	92.22	12.22	20.59	22.94			0.00
Non R/ECAP tracts	315	93.31	13.06	44.26	27.87	9.84	12.79	0.00
HCV Program								
R/ECAP tracts	6,192	14.53	23.01	1.25	95.70	2.87	0.05	47.82
Non R/ECAP tracts	12,399	11.58	19.95	1.37	94.99	3.28	0.22	53.64

Table 7 Excerpt: PART B - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category
(Reflects "Number" of Households)

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	# Elderly	# with a disability*	# White	# Black	# Hispanic	# Asian or Pacific Islander	# Families with children
Public Housing								
R/ECAP tracts	1,427	520	583	19	1384	21	1	524

Non R/ECAP tracts	257	16	35	0	240	17	0	178
Project-based Section 8								
R/ECAP tracts	1,816	1371	510	558	1048	76	0	0
Non R/ECAP tracts	2,321	1500	402	622	1275	357	65	391
Other HUD Multifamily								
R/ECAP tracts	181	167	22	37	42	0	0	0
Non R/ECAP tracts	315	294	41	139	88	31	40	0
HCV Program								
R/ECAP tracts	6,192	900	1425	77	5926	178	3	2961
Non R/ECAP tracts	12,399	1436	2474	170	11778	407	27	6651

- iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

HUD Table 8 provides demographics of Publicly Supported Housing Developments by program category. Data on the **Public Housing** developments consistently reports Black household occupancy rates between 94%-100% with all other racial/ethnic household occupancy rates ranging between 0-6%. One exception is the River Garden Phase II Public Housing Development reporting occupancy rates of 86% Black households and 14% Hispanic households. With the exception of HANO's elderly designated developments, the percentage of households with children in Public Housing developments generally ranges between 45-80%. At 87%, the Westbank Scattered Sites has the greatest percentage of households with children.

According to the demographics provided in HUD Table 8, the **Project-based Section 8** Developments are primarily populated by African American households with occupancy percentages ranging from 77-96%, followed by White households ranging from 2-21% occupancy. Exceptions include the Mater Dolorosa development with 43% Black, 49% White, and 8% Hispanic households; and Christopher Inn with 47% Black, 50% White, 3% Hispanic, and 1% Asian households. New Orleans Project-Based Developments are occupied by greater than 92% elderly households, however, households with children reside in the Tivoli Place Apartments (3%) and in Satchmo Plaza (4%).

Demographics are unavailable in the HUD data for Low Income Housing Tax Credit (LIHTC) developments. However, due to the mixed-finance model used in redeveloping the majority of New Orleans Public Housing, there are significant numbers of LIHTC units embedded within the HANO Public Housing portfolio.

The HUD data (e.g., Table 5) provides a "point-in-time" count of 1,684 public housing units and that "point-in-time" snapshot has been used in this AFH analysis in order to maintain a consistent, "apples to apples" methodology in evaluating issues relating to the various categories of publicly supported housing. HANO's *current* Public Housing inventory is comprised of 2,006 units and 1,333 (66%) of those units are LIHTC subsidized. Thus, to that extent, the demographics of LIHTC households living in HANO's Public Housing communities are reflected in this demographic analysis.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

Affordable housing is subsidized with public funds by incentivizing the building of affordable housing units and by providing financial assistance to make the rent payments affordable for low-income families. The below table captures several other categories of publicly-assisted units in the New Orleans area.

<u>Other Public Supported Housing</u>	<u>New Orleans Jurisdiction</u>
HANO Single Room Occupancy	154
LHC Shelter plus Care	995
LHC Permanent Supportive Housing	689
HUD Veterans Affairs Supportive Housing	265
City of N.O. Shelter Plus Care	49
HOPWA/HOME) Tenant Based Rental Assistance	317

- v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Data provided in HUD Table 8 and Map 5 was insufficient to fully compare demographics within all categories of the city's publicly supported housing to the demographic composition (i.e., census tracts) of the areas in which they are located. Working with available data, a limited analysis was performed relative to the Public Housing and Project-based Section 8 housing categories.

Public Housing:

HANO's Public Housing properties are comprised of one or more Asset Management Projects (AMPs), and the AMPs are generally associated with each property's "redevelopment phases". For example, the Faubourg Lafitte property is comprised of two AMPs – Lafitte I and Lafitte II.

To address this AFH component, Public Housing AMPs were grouped by development and evaluated in the context of each development's corresponding census tract locations. Findings are summarized as follows:

Racial/ethnic demographics of Columbia Parc, Fischer, Guste, The Estates (formerly Desire), Marrero Commons, and Westbank Scattered Sites were closely aligned with the demographic composition of the census tracts in which they are located – with Black households greater than 90% and households in other racial/ethnic categories aggregated at less than 10%. The River Garden development, which has 0% white public housing households is located in a more racially and ethnically diverse census tract which has 16% white residents. Finally, as highlighted below, the Downtown and Uptown Scattered Sites properties demonstrate significantly different demographics from their respective census tracts which are also characterized by poverty rates at less than 20%.

	% White	% Black	% Hispanic	% Asian
Downtown Scattered Sites	0	100	0	0
Census Tract 22071000602	41	50	6	1
Uptown Scattered Sites	0	100	0	0
Census Tract 22071010600	60	33	4	1

Project-based Section 8 Housing:

Developments in the Project-based Section 8 category were also reviewed within the context of their respective census tract locations. Specifically, there were 17 such properties analyzed, the vast majority of which are elderly housing complexes. Eleven (11) of the 17 Project-based Section 8 developments have racial/ethnic characteristics similar to the census tract in which they are located. Included are: St. John Berchman's Manor, St. Martin House, Peace Lake Towers, Satchmo Plaza, The Terraces on Tulane, Mater Dolorosa, Nazareth Inn, St. Michael Senior Housing, Annunciation Inn, Garden Oaks Towers, and Renaissance Place.

The six remaining properties in the Project-based Section 8 category show greater differences in racial/ethnic makeup of households living in the properties versus households living elsewhere in the respective census tracts.

	% White	% Black	% Hispanic	% Asian
Tivoli Place Apartments	21	78	1	0
Census Tract 22071013400	62	23	6	7
Pine Street Apartments	13	87	0	0
Census Tract 22071012800	66	19	8	4
Delille Inn	2	96	2	0
Census Tract 22071001751	11	61	22	4
Christopher Inn	50	47	3	1
Census Tract 22071002600	73	16	6	2
Chateau D'orleans	0	100	0	0
Census Tract 22071001750	1	33	10	54
Nazareth II	9	89	2	0
Census Tract 22071012800	66	19	8	4

c. Disparities in Access to Opportunity

- i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

HUD Maps 5 and 6 show that all categories of publicly supported housing are frequently located either within or in close proximity to R/ECAPs where Black households comprise 84.08% of the population and families with children comprise 46.72% of the population. Additionally, HUD Table 6 shows that 71.05% of Black households are classified as low-income (0-80% AMI) under HUD's criteria.

According to a 2014 Orleans Parish Place Matters report, persistent poverty can have multiple negative effects on the growth and development of youth, creating disparities in economic opportunity. These disparities in economic opportunity (primarily in the R/ECAP areas) result in high unemployment, often leading to crime and violence (www.PlaceMattersforEducationinOrleansParish.org, 2014). In addition, according to HousingNola, a majority of jobs in New Orleans' key economic sectors pay below the CNO's median income of \$26,500. The disparities in access to opportunity for residents of publicly supported housing can be attributed to limited public transportation, limited public services, limited economic investment in some of the R/ECAP areas defined by HUD as having a majority Non-White population greater than 50%, with more than 40% living at or below poverty (www.HousingNola.org, 2015). Education, environment, health, social, as well as political indicators have been measured in a study released in January 2015 by the Greater New Orleans Foundation entitled: "The Geography of Opportunity", which examined and analyzed access to opportunity across the New Orleans region (www.HousingNola.org, 2015). The study highlights that where a person lives geographically can have long-range effects on a person's life, physically, emotionally, as well as economically.

As indicated in HUD Table 12, when comparing indices for disparities in access to opportunity for persons both above and below the poverty line, African Americans have less access to opportunity in all categories.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

VASH (Veterans Affairs Supportive Housing)

In April of 2015, HANO received 56 vouchers under the Veterans Affairs Supportive Housing (VASH) program and in April 2016, HUD invited HANO to apply for 22 additional VASH vouchers to be administered in partnership with the Department of Veterans Affairs (VA) facility and Southeast Louisiana Health Care System/New Orleans VA Medical Center. In response, the Agency has recently applied to HUD for an additional 22 VASH vouchers in the 2016 funding cycle.

- b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

The Housing Authority of New Orleans' (HANO) Homeownership Department was created to assist public housing and HCVP (Section 8) residents with becoming first time homeowners. HANO screens and refers clients to HUD approved homebuyer and financial fitness programs for the training and preparation required to meet first time homebuyer eligibility. HANO recruits and trains lenders and real estate agents in the HCVP program. HANO staff also works closely with providers of soft second mortgages and other assistance programs and assists families with accessing such funding. In addition, the Department participates in the planning and monitoring of homeownership programs that are a component of HANO's development projects.

The homebuyer pays 30% of their adjusted monthly income toward the mortgage payment of principal, interest, taxes and insurance payments (PITI). However, they can pay up to 40% if the mortgage payment exceeds the payment standard. The Section 8 HAP contribution can be utilized to pay the difference between the actual mortgage and the portion that can be paid by the homebuyer.

HANO may refer Section 8 homebuyers to community organizations for additional subsidies to reduce the principal cost of their homes or to apply toward a second mortgage. In addition, the City of New Orleans' Soft Second Mortgage Pool provides Section 8 Homebuyers with a subsidy that is funded under the HOME Investment Partnership Program, commonly referred to as HOME funds. Subsidies may be provided to families earning 80% or less of the area's median income. This second mortgage is forgiven if the homebuyer maintains the property for a given period of affordability and if the buyer does not default on the first or second mortgage.

Section 8 families are encouraged to participate in HANO's Family Self-Sufficiency Program in order to gain an additional subsidy for the purchase of a home. The program encourages self-sufficiency by contributing to an escrow account for the family upon satisfactory completion of self-sufficiency goals. Participants may apply the escrow funds toward educational, employment and homeownership expenses.

The major obstacle to affordable homeownership opportunities for HANO's Section 8 participants is New Orleans' housing costs. The median home sales price in Orleans Parish is over \$180,000. However, since the start of the program in 2001, HANO has assisted 284 public housing and voucher participants in becoming homeowners. It provides direct technical assistance and referrals to families through the entire home buying process, from the completion of an application to loan closing.

According to HUD data as of July 31, 2016, the demographics of 195 active homeownership households are as follows:

**Demographic Snapshot of HANO's HCV Homeownership Program Participants
Report on 195 Households
As of July 31, 2016**

Households with Children	112 (57%)
Female Headed Households with Children	109 (55%)
Disabled Households	50 (26%)
Elderly Households	23 (12%)
Race	99% Black / 1% White
Ethnicity	6% Hispanic / 94% Non-Hispanic
Average Annual Income	\$22,126

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing:

At the 1st Public Hearing, a resident said they could not get Public Housing and that the only option left for people was habitat for humanity. Another resident said that if it weren't for Section-8 Vouchers they would be on the street. In addition, some residents expressed real concern over HANO's termination of housing assistance for some residents. Included in this criticism of the termination process at HANO, concerns over how minor infractions over little incidents could result in residents being evicted from HANO's housing. In addition, residents at the 1st Public Hearing expressed that there is a big problem across New Orleans in the Section-8 program concerning (what these residents perceived) landlords getting Section-8 inspectors and administrators to 'cover up problems'. These residents at the public hearing said that in their opinion there was a lack of accountability for private landlords to follow code because there was no follow-up by HANO inspectors to follow the correct policy.

Most housing admissions are at the discretion of private landlords and some of the comments received indicated that costs as well as discrimination are factors in housing admission decisions.

The Housing Authority of New Orleans maintains a Waiting List for available units greatly exceeds available units. According to the comments, the income limits for public housing are an obstacle for some people; they feel that "HCV is for very, very low income people" comment made at public hearing held on July 19, 2016, as part of the HUD Affirmatively Furthering Fair Housing (AFFH) process.

Land use and zoning laws:

At the 1st Public Hearing some residents expressed concerns that current City Planning Commission laws are outpricing them out of their neighborhoods.

Community opposition:

While Public Housing developments in the City have undergone a dramatic physical transformation, with wholesale replacement and redevelopment at the public housing sites, some residents felt that the Housing Authority utilized unethical practices and violated residents' rights as discovered at a public hearing held on July 19, 2016, as part of the HUD Affirmatively Furthering Fair Housing (AFFH) process. Some residents of public housing feel a lack of community and that they feel "under informed" of what is happening with housing programs. In the process of remaking the developments, the initial opposition came from existing residents opposed to the demolition of their dwellings.

Recently, more opposition revolves around the "fear and stigma" attached to Section vouchers by landlords and residents in high opportunity areas. This "fear" makes it difficult for voucher holders to utilize vouchers and seek residences in lower opportunity areas. ("New Orleans public housing remade after Katrina. Is it working?" available at www.NOLA.com/katrina/index.ssf/2015/08/new_orleans_public_housing_dem.html.org)

Impediments to mobility:

- At the 1st Public Hearing, some residents expressed that there are challenges accessing jobs in New Orleans. In addition, jobs here in New Orleans are temporary and not sustainable.
- According to the City's website, "Improvements to streets, passageways, curb cuts, signage and transportation remain a principle focus of our rebuilding efforts. Just as we seek to improve physical accessibility, the city is striving to improve communications, equal access to employment and accommodations in all public meetings."
www.NOLA.com/Departments/Americans with Disabilities Act
- To meet the ADA requirements, the City has also provided accessibility of restrooms in public buildings and recreational facilities.
- The City actually began adding ADA compliant ramps to sidewalks following the adoption of ADA. However, following the devastation wrought by Hurricane Katrina in 1995, the City's Public Works Department was able to install ADA compliant ramps to sidewalks and medians as it completed storm related repair and replacement of sidewalks.
- The City website also includes a link to the local transit provider and its options for providing transportation for persons with disabilities. That link leads to the transit companies services for persons with disabilities:
- "The RTA is an essential part of New Orleans, and making our transportation system accessible to everyone is a key part of our commitment to the people of our city. In order to make it easy for persons with disabilities to get where they need to go, our system includes: Standard buses and streetcars equipped with devices for disabled riders; Paratransit service" (<http://www.norta.com/Accessibility.aspx.org>)

Lack of private investment in specific neighborhoods:

Many neighborhoods have undergone much rebuilding and restoration "post Katrina," but some continue to lack private amenities. Often times, these decisions are based upon the opportunity to gain profit for the organization. A business will look at four elements in an opportunity: a need, means to fulfill the need, method to apply the means to fulfill the need and a method to benefit
https://en.wikipedia.org/wiki/Business_opportunity.org

As such the private entities will make the decisions from existing information about an area, typically from the US Census to determine if they have an opportunity to provide goods or services and make a profit doing it. With profit being the driving factor, businesses will locate where they

can meet their profit expectations in low opportunity areas, while need may be present, often times the “method to benefit” may be lacking.

Lack of public investment in specific neighborhoods, including services and amenities:

Public investments in neighborhoods have recently been on the increase in the City. For the past ten years, the City has repaired or renovated community centers, healthcare facilities, and rebuilt playgrounds. The City’s Department of Public Works maintains a list of repair and improvement projects throughout the entire City which details the specific location of that work. <http://www.nola.gov/dpw/projects/all/.org>

Lack of regional cooperation:

This topic drew comments due to the lack of regional transportation, especially regarding transportation. Participants cited the difficulty in traveling across the region on public transit and therefore, to where jobs are : “Jobs that are close to home don’t pay that much,” comment made at public hearing held on July 19, 2016, as part of the HUD Affirmatively Furthering Fair Housing (AFFH) process. A case in point, two transit companies service the airport. Both provide service between the airport and downtown New Orleans. If the companies worked together, the duplication of service could be eliminated and those resources used to service other routes, or provide service to underserved areas.

Source of income discrimination:

A participant in the 1st public hearing noted that she was turned away from rentals because landlords preferred tenants with Section 8 vouchers instead of renters who lack any subsidy.

D. Disability and Access Analysis

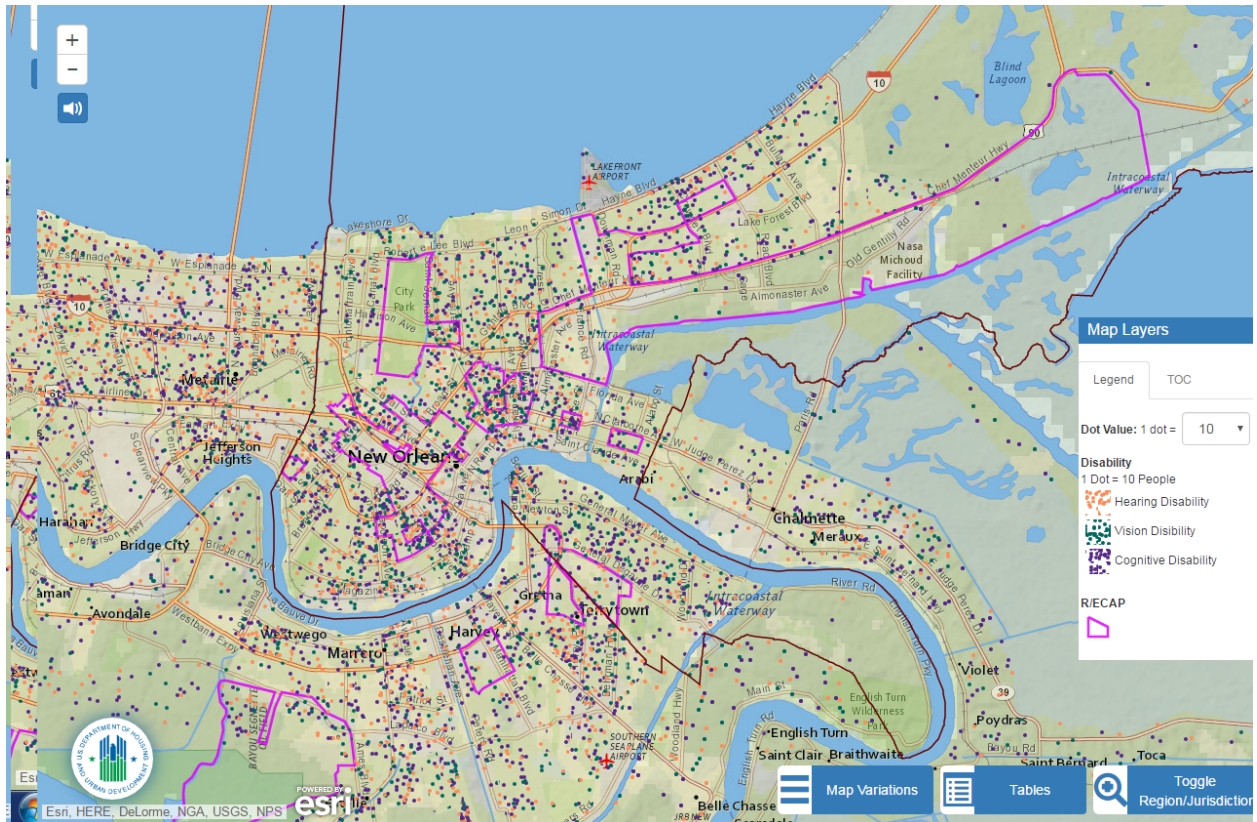
1. Population Profile

- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

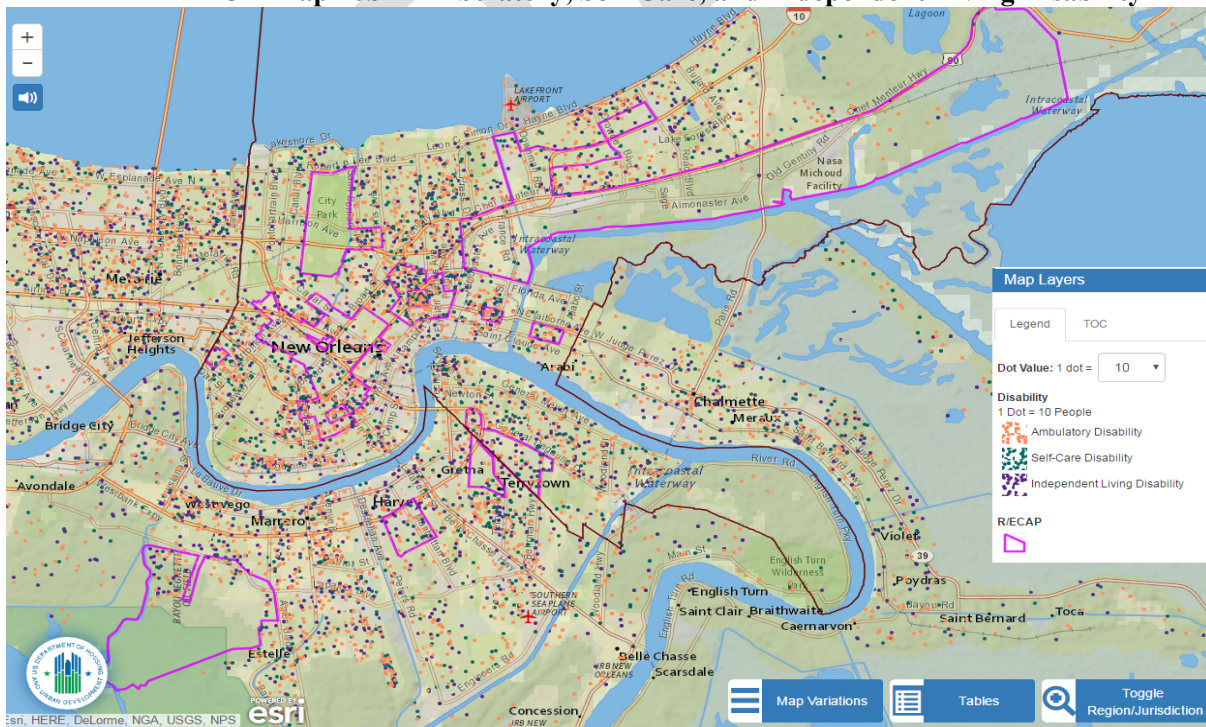
The HUD Maps 16a and 16b below depict the number of person with disabilities living in various areas of the City and the region including those who live in R/ECAPs (race/ethnic concentrated areas of poverty) and segregated areas. Items to note are as follows:

- Persons with disabilities are pretty evenly dispersed through the City. Areas that have fewer persons with disabilities are the English Turn, New Orleans East, and Metairie Cemetery/County Club areas which are areas according to the Ride New Orleans report that have had a 60 to 100% decrease in public transportation services into the Central Business District. (P. 14, <http://rideneworleans.org/wp-content/uploads/2015/08/sots2015new.pdf>)
- In the region, the areas that show lower amounts of persons with disabilities appear to be the St. Bernard Parish area, Avondale/Bridge City, and Elmwood area.

HUD MAP 16a – Hearing, Vision, Cognitive Disability

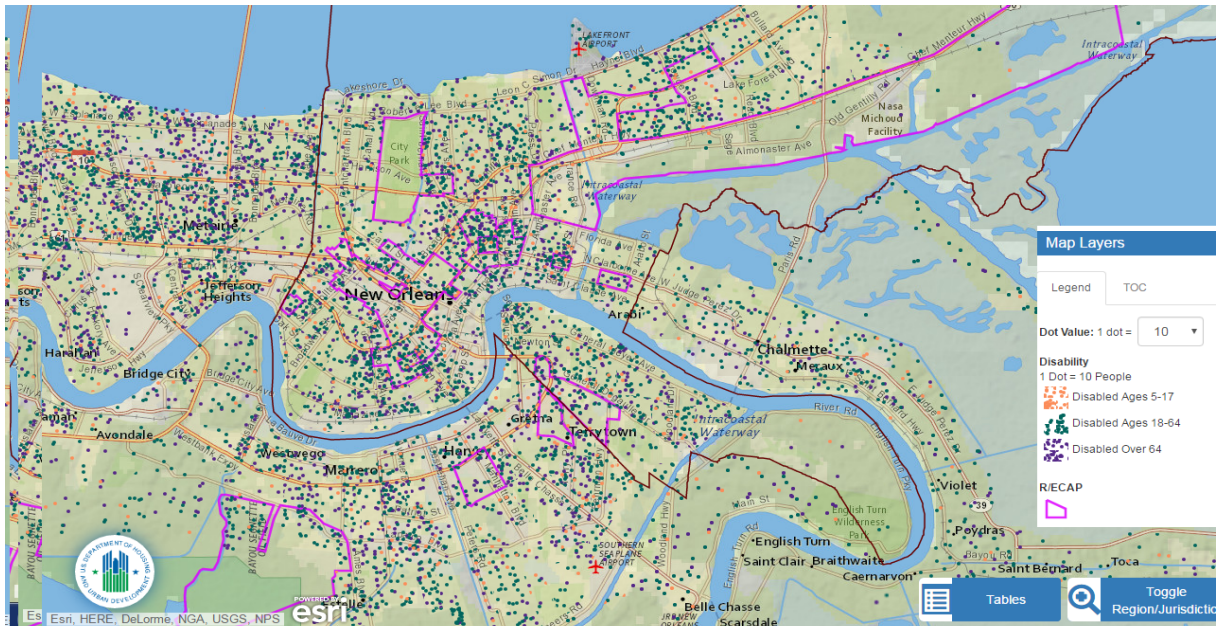


HUD Map 16b – Ambulatory, Self-Care, and Independent Living Disability



- b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

From a review of HUD Map 17a below which depicts disabled individuals by age group, it appears that person with disabilities in different age ranges are consistent with geographic patterns of disabled individuals with varying disabilities; i.e, they are also pretty evenly dispersed through the City and the region except for the English Turn, New Orleans East, and Lakeview area. The same holds true for the region except for the St. Bernard Parish area, Avondale/Bridge City, and Elmwood area. This map also shows that the 18-64 age group constitute the majority of disabled persons in the City.



2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Below information and tables are indicators that the New Orleans jurisdiction nor the metropolitan region have sufficient affordable, accessible housing:

From a comparison of the number of households in publicly supported housing that houses persons with disabilities (6,934) to the number persons with disabilities in New Orleans which is approximately 94,596 (this number may be inflated due to individuals having multiple disabilities that are counted in multiple disability categories on the HUD Table 13), it appears that the City needs far more affordable, accessible units to adequately support this protected class.

If one only reviews one type of disability like ambulatory, it remains clear that there is not enough accessible, affordable housing to support the 26,013 individuals with ambulatory disabilities.

	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction							
Households	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	# Disabled	% Disabled
Housing Type								
Public Housing ¹ (1,868) ³	0	654	467	617	112	0	867	46%
Project-Based ¹ Section 8 (1,309)	27	707	354	184	27	0	515	39%
Other Multifamily (494) ²	-	490	4	0	-	-	25	5%
HCV Program ¹ (16,643)	166	2497	6324	6324	1166	166	5527	
Note 1: Data Sources HUD Resident Characteristics Report								
Note 2: Data Sources: APSH provided 0-1 Bedrooms, 2 bedrooms, and 3+ bedrooms only.								
Note 3: Number of bedrooms do not add to total due to rounding percentages on HUD Characteristic Report.								
Note 4: Regional data from HUD Resident Characteristics Report incomplete.								

HUD Table 13 – Disability by Type

	(New Orleans, LA CDBG, HOME, ESG) Jurisdiction		(New Orleans-Metairie, LA CBSA) Region	
Disability Type	#	%	#	%
Hearing difficulty	9,626	2.92	41,612	3.72
Vision difficulty	11,234	3.41	31,920	2.86
Cognitive difficulty	20,488	6.22	66,092	5.92
Ambulatory difficulty	26,013	7.90	86,930	7.78
Self-care difficulty	9,930	3.02	31,902	2.86
Independent living difficulty	17,305	5.26	55,662	4.98
TOTAL Disabled*	94,596		314,118	
<i>Note: Total may have counted individuals more than once due to multiple disabilities. Although rare, it's conceivable that a person with multiple disabilities could be counted as many as 6 times.</i>				

According to the Advocacy Center of Louisiana, there is a critical shortage of affordable, accessible housing for people in Orleans Parish living with a disability. Approximately 14% of residents (not institutionalized) in Orleans Parish are living with a disability. This number includes people with ambulatory difficulties, independent living difficulties, and self-care difficulties. For some of these people, Social Security Supplemental Income (SSI) is their only source of income. Fair Market Rents have so far outpaced SSI payments for people living with a disability that a small one-bedroom unit would cost a renter 116% of his or her monthly payment.

<http://www.nola.gov/community-development/documents/general-reports/2012-2016-consolidated-plan-city-of-new-orleans-w/>

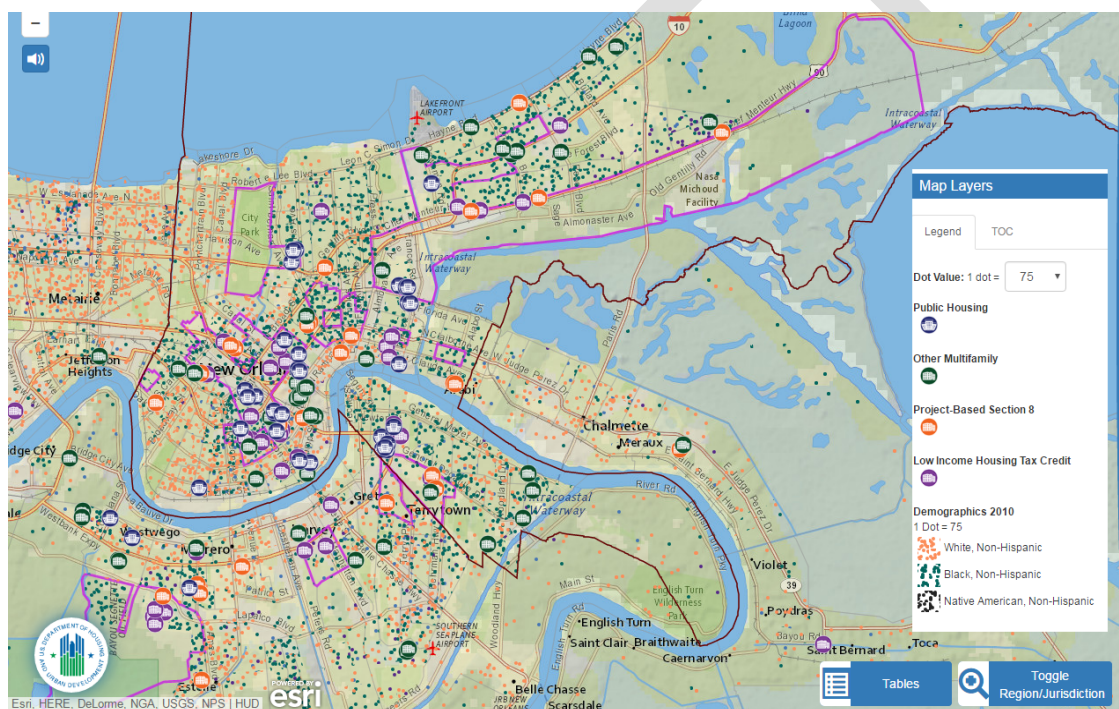
The City of New Orleans 2012-2016 Consolidated Plan provides disability information based on survey respondents indicating whether they had a disabling condition. It is estimated that fifty-five percent (55%) of the local homeless population is disabled, a

much higher percentage than the national rate of 40%. There are currently 2,382 homeless persons experiencing at least one disability on any given night in New Orleans. The level of disability is most severe in the street and abandoned building populations.

<http://www.nola.gov/community-development/documents/general-reports/2012-2016-consolidated-plan-city-of-new-orleans-w/>)

- b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

The below map depicts affordable, accessible units provided by public housing, project based Section 8, low-income housing tax credits, and other multifamily sites. The map clearly shows that some areas like Lakeview and English Turn area have no presence of any publicly supported housing. Surprisingly, although some areas of New Orleans East have a high prevalence of publicly supported housing, other areas around NASA Michoud Facility and the Intracoastal Waterway has no presence of publicly supported housing.



HUD Table below indicates the percentage of disabled individuals who live in publicly supported housing within R/ECAP and non R/ECAP areas. The table shows that 1,427 Public Housing occupied units are found in concentrated areas of poverty and 40.87% of those units are occupied by disabled individuals. Although the percentage of disabled living in R/ECAP areas who utilize Project based Section 8 and HCV Section 8 are less than the percentage in public housing, the percentage is still substantive with 28.07% of the occupied units for Project based Section 8 being occupied by disabled individuals and 23.01% of the occupied HCV units being occupied by disabled individuals. Only Multifamily sites show a slightly greater percentage of disabled individuals living in non R/ECAP areas than R/ECAP areas. See table below.

HUD Table 7 - R/ECAP and Non-R/ECAP Publicly Supported Housing
Program Category

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% with a disability
Public Housing		
R/ECAP tracts	1,427	40.87
Non R/ECAP tracts	257	13.51
Project-based Section 8		
R/ECAP tracts	1,816	28.07
Non R/ECAP tracts	2,321	17.30
Other HUD Multifamily		
R/ECAP tracts	181	12.22
Non R/ECAP tracts	315	13.06
HCV Program		
R/ECAP tracts	6,192	23.01
Non R/ECAP tracts	12,399	19.95

- c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

The below HUD table depicts the percentage of people with disabilities living in publicly supported housing in the City and the region. The number of people living in publicly supported housing is only a fraction of the disabled population in New Orleans based on the total of disabled individuals as present in HUD Map 13 which may be as high as 94,596 individuals.

(New Orleans, LA CDBG, HOME, ESG) Jurisdiction	People with a Disability*	
	#	%
Public Housing	534	36.08
Project-Based Section 8	907	22.12
Other Multifamily	63	12.75
HCV Program	3,893	20.84
(New Orleans-Metairie, LA CBSA) Region		
Public Housing	735	27.46
Project-Based Section 8	1,030	16.21
Other Multifamily	100	11.48
HCV Program	5,424	20.88

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

- a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

In 1999, the U.S. Supreme Court issued its landmark Olmstead v. L.C. ruling that Title II of the American with Disabilities Act requires states to make diligent efforts to serve individuals

in the most integrated setting. The decision sparked lawsuits to secure community services for institutionalized persons as well as other individuals who potentially face institutionalization absent community services. The below case details a lawsuit in Louisiana detailing a violation of Olmstead that contributed to persons with disabilities in the New Orleans jurisdiction and region residing in segregated settings.

http://www.ndrn.org/images/Documents/Issues/Community_integration/Resources/NDRN_Litigation_Status_122704.pdf

Year 2000 Case

In April 2000, five individuals (two with developmental disabilities and three with physical disabilities) along with Resources for Independent Living filed a complaint in the U.S. District Court for Eastern Louisiana against the Louisiana Department of Health and Hospitals (DHH) alleging that the state was violating the ADA and §504 of the Rehabilitation Act by restricting the availability of services to “unnecessarily segregated settings” (i.e., nursing facilities). The plaintiffs with non-developmental disabilities sued for access to the state’s elderly and disabled and/or personal care attendant waiver programs; the plaintiffs with cognitive disabilities wanted access to Louisiana’s developmental disabilities and personal care attendant waiver programs. The plaintiffs charged that Louisiana spends “90% of its Medicaid funds on institutional services.” They asked the Court to: 1) grant class action status to Louisianians with disabilities who are unnecessarily institutionalized and 2) find the state in violation of the ADA and §504 of the Rehabilitation Act.

In August 2001, DHH Secretary David Hood unveiled a settlement agreement that provided for boosting state spending by \$118 million over a four year period to provide community services to 1,700 more individuals and reduce waiting time for services to 90 days or less. The settlement plan submitted by DHH, agreed to by the plaintiffs and approved by the court addressed four broad areas: (a) reducing the waiting time for community-based services; (b) supporting people to make informed choices about service options; (c) adding a Medicaid state plan personal care services option; and, (d) instituting individualized long-term care assessments through a new single point of entry system. In the agreement, the state committed to eliminate the waiting list for waiver services by 2005. The Louisiana Nursing Home Association objected to the personal care coverage but the court turned the objection aside.

In 2003, DHH submitted a \$38 million request to the Louisiana legislature to fund the addition of personal care to the Medicaid state plan. But, the legislature balked at this request. Instead, it appropriated \$28 million, instructed DHH to delay adding personal care to the Medicaid state plan, and directed state officials to return to court to seek a modification of the settlement agreement to further expand HCBS waiver programs in lieu of adding personal care to the state plan. In July 2003, as directed by the legislature, the state filed a motion to amend the settlement agreement. The Louisiana Advocacy Center (LAC), which represents the plaintiffs, opposed changing the agreement. National AARP filed an *amicus* brief in support of the LAC motion. In the meantime, nursing home interests filed a motion to intervene in support of the state’s proposed modification, expressing concern that the activating the personal care option might put their businesses at risk.

In September 2003, the court denied the state’s motion to modify the settlement, directed it to comply with the settlement order and rejected the nursing home request to intervene.

Year 2010 Case

Brought by the Louisiana Protection & Advocacy on behalf of four individuals with disabilities who receive and depend on Medicaid Personal Care Services (PCS) in order to

remain in the community and to prevent hospitalization and institutionalization. Plaintiffs filed suit to prevent Louisiana from reducing the maximum number of PCS hours available each week. The DOJ filed a Statement of Interest supporting the Plaintiffs' argument that the cuts would place individuals with disabilities at risk of institutionalization and urging the Court to deny the state's Motion for Summary Judgment.

In May 2011, the District Court denied the state's Motion for Summary Judgment. In June 2011, the Court granted the Plaintiffs' Motion to Certify a Statewide Class of Individuals affected by the reduction in PCS services.

In February 2012, the parties reached a Settlement Agreement requiring that slots on the Community Choice Waiver program will be set aside for people who were approved for more than 32 hours of long-term personal assistance services before the 32-hour cap took effect. The Community Choice Waiver program, which has a four-year waiting list for most people who are not currently in nursing facilities, provides personal care services as well as a variety of other services that enable people to remain in their homes and communities. Additionally, the state will offer waiver slots on an expedited basis to class members who apply if they can show that without the additional services, they will not be able to maintain their health and are at serious risk of nursing facility placement. The settlement requires the Louisiana Department of Health to ask the federal government for approval for an additional 200 Community Choice Waiver slots to meet the needs of class members. If any of these slots are not needed for class members, they will be added to the pool of slots that are available to meet the needs of others who are waiting for the services. Further, the state must "use its best efforts" to have an additional 500 Community Choice Waiver slots included in the governor's executive budget.

- b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

According to the Louisiana Developmental Disabilities Council the following supportive services exist (<http://www.laddc.org/Initiatives.cfm?aid=6&id=17>):

- **Supported Living** for adults with behavioral health needs is available in five regions of the state (New Orleans, Baton Rouge, Houma/Thibodaux, Alexandria and Shreveport). Limited funding is available to assist individuals who are making/have made the transition from institutional settings to the community. Support coordination, rental assistance, furniture, transportation, etc. are the types of assistance available.
- **Supported Living** services are available for a very small number of adults whose disability occurred after the age of 22 but before the age of 55. Limited funding is available to assist individuals moving out of nursing homes into the community or to those at risk of institutionalization. Support coordination, rental assistance, furniture, transportation, etc. are the types of assistance available.
- **Medicaid Home and Community Based Waiver Services** allow people the flexibility to decide where they want to live and to access supports and services that best meet their individualized needs. Louisiana has four Developmental Disability waivers, each with a specific service package and eligibility requirements: the New Opportunities Waiver, the Children's Choice Waiver, the Residential Options Waiver, and the Supports Waiver.

- **Flexible Family Fund** provides a monthly stipend of \$258 to families of children with the most severe developmental disabilities to offset the costs of maintaining their child in their own home.
- **Individual and Family Support** provides an array of flexible supports and services to allow people with developmental disabilities to live in their own homes or with their families in their own community. These supports are available based on priority of need, rather than first-come, first-served. There is no menu of services, but rather the supports are flexible to meet individual needs.
- **Assisted Elderly Living** Louisiana, like the South in general, has lagged behind other parts of the country when it comes to assisted living centers. Nursing home care has long been the dominant care model in Louisiana, although the number of those facilities fell from 288 homes in 2005 to 266 in 2016. In 2012, the AARP ranked Louisiana 50th in the nation for its number of assisted living facilities. The bottom five states — Louisiana, Mississippi, Nevada, West Virginia and the District of Columbia — averaged 11 units per 1,000 residents 65 or older, compared with 62 units for the top five states of Minnesota, Oregon, Idaho, Wisconsin and Washington. The national average is 31 units. But Louisiana is trending upward, as more providers are drawn to the state by the unmet demand. In 2010, the state had 86 assisted living centers. As of 2016, there are 138, according to the Louisiana Department of Health, though the state doesn't track the number of beds in those facilities.
http://www.theadvocate.com/new_orleans/news/business/article_db14b99c-55d1-11e6-9971-5f653bc3e772.html
- **Permanent Supportive Housing** In addition, the Housing Authority of New Orleans, the City of New Orleans, and other nonprofits offer affordable housing. HANO houses low-income disabled individuals in public housing, project based, and HCV units. Permanent supportive housing vouchers are also available through HANO and the City of New Orleans. The City of New Orleans also provides financial assistance so that disabled homeowners can make repairs to homes. Based on information obtained from the City of New Orleans Office of Community Development 2012-2016 Consolidated Plan, as of 2012 there were 1,857 counted persons living in Permanent Supportive Housing (PSH) <http://www.nola.gov/community-development/documents/general-reports/2012-2016-consolidated-plan-city-of-new-orleans-w/>, pages 47-48.

4. Disparities in Access to Opportunity

- To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:
 - Government services and facilities

On July 26, 2007, the Department of Justice entered into an Amended Settlement Agreement with the City of New Orleans, Louisiana, under the Americans with Disabilities Act of 1990 (ADA) to make physical changes to specified facilities within specific time frames to come into compliance with ADA requirements.

<https://www.ada.gov/newola.htm>

The Jefferson Parish Council recently approved moving more than two dozen polling precincts as part of a settlement agreement in the federal case entitled *Drake v. Jefferson Parish*. The polling precincts did not meet requirements of the Americans with Disabilities Act and the Rehabilitation Act. The suit that produced the settlement — originally filed in 2010 by Kenner resident Denise Drake, who suffered from a debilitating neurological disease — alleged that people in wheelchairs had too many barriers to overcome to cast their ballots at their polling places during election time. http://www.theadvocate.com/new_orleans/news/communities/east_jefferson/article_f5d6577d-8238-592f-868e-83f31e2d3667.html

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Not until March 2016 did New Orleans install the first Accessible Pedestrian Signal located at McAlister crosswalks at the Tulane University campus. It is an audible beeping that helps visually impaired people know when it is safe to cross the road. This is the only APS in the City.

https://www2.tulane.edu/news/newwave/031716_aps_crosswalks.cfm

In addition, the majority of schools show that sidewalks and curb ramps are poor or missing. See table on subsequent pages.

http://prc.tulane.edu/uploads/kidswalk_coalition_web_final-1305305697.pdf

Sidewalks in New Orleans remain in a state of disrepair. Cracks are present on the majority of sidewalks, making movement in a wheelchair uneven and bumpy. The roots of trees upend sidewalks, making the traverse quite difficult at times. Some sidewalks are not equipped with curb cuts, making them inaccessible to the independent wheeler. <https://wheelchairtravel.org/new-orleans-la/>

A report from the local newspaper highlights issues with public infrastructure in New Orleans. <http://bcove.me/dslup17m>

iii. Transportation

Based on a study commissioned by the New Orleans Regional Transit Authority, only 5.7 percent of bus stops are ADA compliant.

http://www.nola.com/traffic/index.ssf/2016/03/new_orleans_faces_lawsuit_over.html

St. Charles streetcar is not ADA accessible.

http://www.nola.com/politics/index.ssf/2016/04/new_orleans_st_charles_streetc.html

LIFTA paratransit services are available and feature modified vans that are equipped with lifts to accommodate passengers who use wheelchairs with door-to-door pick-up. Paratransit passengers must first be certified as eligible to use the services, which usually consists of filing an application that describes the passenger's disability, explains why he/she is unable to use regular transit, and requires the signature of a health care professional which can be a time consuming process for someone who lacks transportation. After the submission, it may take up to three weeks for the RTA to process paperwork for paratransit services, and then the passenger receives a letter in the mail about the decision. Once deemed eligible, the passenger must then make advance

reservations for transportation. <http://www.norta.com/Accessibility/Eligibility-for-Paratransit.aspx>

As of 2014, the city of New Orleans had only a single wheelchair accessible private taxi. <https://wheelchairtravel.org/new-orleans-la/>

iv. Proficient schools and educational programs

The below chart completed in 2011 shows barriers for disabled youth in accessing proficient schools.

Ambulatory

(http://prc.tulane.edu/uploads/kidswalk_coalition_web_final-1305305697.pdf)

School Campus	Sidewalks poor or missing	Curb Ramps poor or missing	School Campus	Sidewalks poor or missing	Curb Ramps poor or missing
A.P. TUREAUD ELEMENTARY 2021 Pauger St.	30.62%	45.2%	JOSEPH CRAIG ELEM 1425 St. Philip St.	2.80%	66.3%
ABRAMSON SCI & TECH CHARTER 5552 Read Blvd.	28.87%	62.3%	JULIAN LEADERSHIP ACADEMY 2701 Lawrence St.	12.39%	100.0%
AKILI ACADEMY OF N.O. 1700 Pratt Dr.	26.54%	82.6%	KIPP BELIEVE COLLEGE PREP 1607 S. Carrollton Ave.	20.22%	60.0%
ALICE HARTE CHARTER 5300 Berkley Dr.	10.27%	89.4%	KIPP CENTRAL CITY ACADEMY 2625 Thalia St.	26.98%	56.9%
ANDREW WILSON CHARTER 3617 General Pershing St.	14.71%	23.4%	KIPP MCDONOGH 15 SCHOOL FOR THE CREATIVE ARTS 721 St. Philip St.	0.91%	57.7%
ARTHUR ASHE CHARTER 3649 Laurel Street	25.96%	50.0%	LAFAYETTE ACADEMY 2727 S. Carrollton Ave.	5.48%	12.8%
AUDUBON CHARTER EXT 719 S. Carrollton Ave.	8.73%	17.9%	LAKE FOREST CHARTER ELEM 12000 Hayne Blvd.	32.23%	100.0%
AUDUBON CHARTER 428 Broadway St.	17.08%	98.8%	LANGSTON HUGHES ACADEMY CHARTER 3519 Trafalgar St.	7.26%	70.4%
BENJAMIN BANNEKER ELEM 421 Burdette St.	31.31%	31.6%	LUSHER CHARTER ELEM 7515 Willow St.	15.03%	82.3%
BENJAMIN E. MAY'S PREP SCHL AT CARVER ELEM 3019 Higgins Blvd.	39.44%	100.0%	LUSHER CHTR MIDDLE & HIGH / N.O. CHTR SCI & MATH HIGH 5624 Freret St. / 5625 Loyola Ave.	11.40%	60.3%
BENJAMIN FRANKLIN ELEM MATH & SCIENCE 1116 Jefferson Ave.	8.99%	86.8%	MARTIN BEHRMAN ELEM 715 Opelousas Ave.	27.67%	79.0%
CROCKER ARTS & TECH 1111 Milan St.	17.31%	44.5%	MARY BETHUNE ELEM 4040 Eagle St.	20.59%	78.7%
D.R. BATISTE CULTURAL ARTS ACADEMY AT LIVE OAK 3128 Constance St.	17.84%	51.4%	MARY D. COGHILL ELEM 5500 Piety Dr.	7.94%	70.6%
DR. CHARLES DREW ELEM 3819 St. Claude Ave.	23.01%	64.9%	MCDONOGH 32 ELEM 800 DeArmas St.	28.47%	72.7%
DR. MLK CHARTER SCHL FOR SCIENCE AND TECHNOLOGY 1617 Caffin Ave.	44.36%	46.1%	MCDONOGH 35 COLLEGE PREP HIGH SCHOOL 1331 Kerlerec St.	22.40%	38.1%
DWIGHT EISENHOWER ELEM 3700 Tall Pines Dr.	25.21%	93.8%	MCDONOGH 42 CHARTER 1651 N. Tonli	17.09%	65.7%
EDGAR P. HARNEY ELEM 2503 Willow St.	17.36%	76.9%	MCDONOGH CITY PARK ACAD 2733 Esplanade Ave.	8.05%	69.4%
EDWARD HYNES 3774 Gentilly Blvd.	16.43%	61.8%	MEDARD NELSON - UNO CHARTER 3121 St. Bernard Ave.	8.07%	93.2%
EINSTEIN CHARTER 5100 Cannes St.	35.48%	36.4%	MILESTON/SABIS CHARTER 5951 Patton St.	8.34%	30.6%
ELEANOR MCMAIN 5712 S. Claiborne Ave.	11.60%	60.6%	MILLER-MCCOY ACADEMY FOR MATH & BUSINESS 7301 Dwyer Rd.	51.32%	83.3%
ESPERANZA CHARTER 4407 S. Carrollton Ave.	27.48%	36.8%	NEW ORLEANS COLLEGE PREP ELEM & MIDDLE/HIGH 3127 Martin L. King Blvd.	41.57%	59.3%
FANNIE C. WILLIAMS ELEM 11755 Dwyer Rd.	32.32%	36.1%	PAUL HABANS ELEM 3819 Herschel St.	17.16%	40.7%
GENTILLY TERRACE ELEM 4720 Painters St.	14.35%	89.2%	PIERRE A. CAPDAU-UNO CHARTER ELEM 3821 Franklin Ave.	12.39%	97.2%
GEORGE W. CARVER HIGH 3059 Higgins Blvd.	56.69%	81.8%	ROBERT R. MOTON CHARTER 6800 Chef Menteur Hwy.	49.17%	96.3%
HARRIET TUBMAN ELEM 2013 General Meyer Ave.	22.25%	96.6%	SAMUEL J. GREEN CHARTER 2319 Valence St.	12.26%	38.8%
HENRY SCHAUMBERG ELEM 9501 Grant St.	11.30%	44.9%	SCITECH ACADEMY AT LAUREL 820 Jackson Ave.	25.07%	58.1%

Cognitive Disability

As stated earlier in this plan, the Southern Poverty Law Center in its report entitled “Access Denied: New Orleans Parents and Students identify Barriers to Public Education” discusses the policies that create barriers for the disabled protected class in attending proficient schools as it reviews the 2007 to 2009 school periods.

www.splcenter.org/sites/default/files/d6_legacy_files/downloads/publication/SPLC_report_Access_Denied.pdf

The findings were as follows:

- The graduation rate for Recovery School District (RSD) students with disabilities was less than half of the overall graduation rate and only 6.8% of RSD students with disabilities exited with a high school diploma, while across the state, the average was 19.4%.
- In the 2008-09 school year, RSD schools suspended nearly 30% of all students with disabilities — a rate that was 63% higher than the state average.
- During the 2007-08 school year, 94.6% of eighth grade RSD students with disabilities failed the Louisiana Educational Assessment Program (LEAP) exam. For the same year, 78.3% of all eighth grade charter school students with disabilities failed the LEAP.
- On average, school districts throughout Louisiana have identified 12.2% of their students as eligible for special education services. New Orleans Public Schools have identified only 8% of their students as eligible for special education services. Comparable school districts throughout the country identify almost twice as many students with disabilities.

v. Jobs

Earning Disparities

According to the Housing NOLA report, individuals with disabilities earn 29% less than those without a disability. <http://housingnola.com/main/uploads/File/HousingNOLAREport.pdf>

Hiring Discrimination

In a settlement reached on August 14, 2014, the United States Department of Justice and the Louisiana Supreme Court put an end to the Department’s three-year investigation into Louisiana’s questionable treatment of lawyers and bar applicants with mental disabilities. DOJ alleged that the court’s procedures for evaluating bar applicants unlawfully discriminated against those with mental health disabilities and, therefore, violated the Americans with Disabilities Act (“ADA”). More particularly, the DOJ alleged that the court unfairly imposed onerous admissions prerequisites on applicants who revealed a mental health diagnosis. Some of these prerequisites included intrusive background investigations and conditional admission for applicants who had no history of committing misconduct or criminal activity. Under the settlement, the court’s character and fitness review of an applicant must now focus principally on the applicant’s past *conduct* rather than on the applicant’s *condition*. <https://lalegaletics.org/wp-content/uploads/2014-08-14-DOJ-LASC-ADA-Settlement-Agreement.pdf>

- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

HANO HCVP Administrative Plan details reasonable accommodation process

HANO strives to ensure that persons with disabilities have full access to HANO's programs and services. HANO may need to verify that a person requesting an accommodation is a qualified individual with a disability. HANO must also determine whether an accommodation is necessary to provide the individual with an equal opportunity to participate in the HCV program. A person who does not meet the definition of disability is not entitled to a reasonable accommodation.

Requests to HANO for an accommodation should be made in writing. However, if an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HANO will treat the information as a request for a reasonable accommodation, even if no formal request is made. HANO requires individuals to certify that they are a person with a disability, under the Americans with Disabilities Act Amendments Act of 2008. Additional details and policies regarding reasonable accommodations are found in the HCVP Administrative Plan pages 25 to 28.

http://www.hano.org/home/agency_plans/2016%20REVISED%20ADMIN%20PLAN.pdf

HANO Admissions and Continued Occupancy – Public Housing reasonable accommodation

HANO policies and practices will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation so they may fully access and utilize the housing program and related services.

Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and they do not create an "undue financial and administrative burden" for HANO or its Agents, meaning an action requiring "significant difficulty or expense."

An applicant or resident may verbally request a reasonable accommodation. HANO and its Agents must consider the request without a provider designated form, but HANO and its Agent will provide the applicant or the resident with the designated form to formalize the verification process.

A reliable, knowledgeable professional will verify all requests for accommodation or modification of a unit. Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability.

HANO or its Agents will require verification from a knowledgeable professional when a request for a home visit recertification is submitted. HANO and its Agents must comply with HUD/DOJ statement that provides instructions on verification of Reasonable Accommodations. Additional details can be found throughout the publication.

http://www.hano.org/home/agency_plans/2016%20REVISED%20ACOP%20FINAL.pdf

City of New Orleans Reasonable Accommodation Process

It is the policy of the City of New Orleans, pursuant to the federal Fair Housing Amendments Act of 1988 and applicable state laws, to provide individuals with disabilities reasonable accommodation in the City's zoning and land use regulations, rules, policies and practices to ensure equal access to housing and to facilitate the development of housing for individuals with disabilities. Reasonable accommodations in the zoning and land use context means providing individuals with disabilities, or developers of housing for people with disabilities, flexibility in the application of land use, zoning and building regulations, policies, practices and procedures, or even waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities. Additional details are codified in the Comprehensive Zoning Ordinance, Article 27.5. http://www.nola.gov/nola/media/One-Stop-Shop/CPC/OSS_BZA_APPLICATION-Reasonable-Accommodation.pdf

- c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

In October 2015, the New Orleans City Council voted to reprogram uses of the Neighborhood Housing Improvement Fund. Funded by a 30-year tax millage New Orleans voters approved in 1991, the fund has been used to pay for rehabilitation to existing homes for homeowners with disabilities so that they can remain in their homes as a number of disabled persons are on fixed incomes and have difficulties making necessary repairs for accessibility. <http://housingnola.com/main/uploads/File/HousingNOLAREport.pdf>

In addition, the below table under the "Disproportionate Housing Needs" section demonstrates the difficulties in maintaining a home for individuals with disabilities and the difficulties of renters who may have a desire for homeownership.

5. Disproportionate Housing Needs

- a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

The below table included in HANO PHA Plan and above in the housing section of this AFH Plan demonstrates disproportionate housing needs experienced by persons with disabilities who are low-income renters.

Housing Problems among Disabled Households - Orleans Parish <i>(household member has at least one type of disability)</i>				
	Hearing or Vision Impairment	Ambulatory Limitation	Cognitive Limitation	Self-Care or Independent Living Limitation

	All	With Housing Problem(s)*	All	With Housing Problem(s)*	All	With Housing Problem(s)*	All	With Housing Problem(s)*
RENTERS	7,020	4,535	10,155	6,760	8,085	5,415	7,215	4,735
HOMEOWNERS	8,365	3,060	11,405	4,290	7,055	2,900	8,840	3,275
TOTAL	15,385	7,595	21,560	11,050	15,140	8,315	16,055	8,010
Source: HUD CHAS 2015 (using ACS 2008-2012 data).								
Please note that an occupied unit may be reflected more than once in the statistical counts if a household member(s) has a disability in more than one of the following categories: hearing or vision impairment; ambulatory limitation; cognitive limitation; and/or self-care or independent living limitation.								
*A household is said to have a housing problem if it has 1 or more of the 4 problems identified in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened.								
**This category includes renter occupied households (0-30% AMI) where cost burden was not computed and where a household has none of the other housing problems.								

Securing permanent supportive housing remains a challenge according to the Housing NOLA report (<http://housingnola.com/main/uploads/File/HousingNOLARepor.pdf>) which states that Housing Choice Vouchers were secured after 2005 for residents with disabilities, but all have been utilized. The Permanent Supportive Housing (PSH) vouchers have been successful in securing housing, but there are too few vouchers to meet the demand, leaving people with disabilities stuck on waiting lists and in nursing homes rather than living independently. On-site supportive service providers who work hand-in-hand with property managers are vastly superior to any kind of off-site counselors or case managers in terms of their ability to keep people housed, paying their rent, and healthy.

There is no complete count of Americans with Disability Act (ADA) accessible rental properties, so it is difficult to understand the full supply within the city. However, in the wake of Hurricane Katrina's flooding, many owners faced requirements to elevate their units.

6. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

New Orleans and the region are still experiencing challenges related to disability and access. The below information highlights a few of these challenges.

- Jazzfest attendee claims in a federal lawsuit that AEG Live and the New Orleans Jazz and Heritage Festival and Foundation have failed to appropriately respond to a December 2001 settlement that required the festival to become ADA compliant. That agreement, according to ADA.gov, required the festival to provide staff training for assisting people with disabilities, sign language interpreters, shuttles and to provide accessible parking spaces, restrooms, permanent seating, craft and food booths and crosswalks.
http://www.nola.com/crime/index.ssf/2016/06/jazz_fest_ada_compliance_new_o.html

- A chance to ride New Orleans' historic streetcar along oak-lined St. Charles Avenue is something to look forward to. But that someone who uses a wheelchair can't take that ride is the subject a lawsuit filed Tuesday (April 19) in federal court. Three men with varying levels of disability sued the city, the Regional Transit Authority and its private manager, Transdev, over lack of access to the St. Charles Streetcar under both the American with Disabilities Act and the Rehabilitation Act.
http://www.nola.com/politics/index.ssf/2016/04/new_orleans_st_charles_streetc.html
 - Three New Orleans residents sued the City on March 28 over allegations that its "bus system is inaccessible to persons with" mobility-related disabilities. The lawsuit comes after the group received an internal review of its bus stops that said roughly 94 percent of all bus stops in New Orleans are not compliant with the Americans With Disabilities Act.
http://www.nola.com/traffic/index.ssf/2016/03/new_orleans_faces_lawsuit_over.html
- b. The program participant may also describe other information relevant to its assessment of disability and access issues.

According to the VERA Institute, people with disabilities experience violence at much higher rates than people without disabilities. In 2013 alone, 1.3 million violent crimes were committed against people with disabilities. Yet, people with disabilities face significant barriers to reporting their victimization—their accounts are often dismissed or not taken seriously—as well as unequal access to social and medical services. This creates difficulties in accessing the judicial system.
<https://www.vera.org/projects/equal-access-for-people-with-disabilities>

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- **Lack of affordable in-home or community based supportive services**
As indicated by the Olmstead case against Louisiana Department of Health and Human Services, lack of affordable in-home or community based services contribute to segregation of disabled individuals by leaving them few options other than segregated institutional living.
http://www.ndrn.org/images/Documents/Issues/Community_integration/Resources/NDRN_Litigation_Status_122704.pdf
- **Access to proficient schools for persons with disabilities**
The chart in preceding pages demonstrate barriers to accessing proficient schools with most schools only partially accessible due to poor or missing sidewalks and curb ramps. In addition, according to the Southern Poverty Law Center, a number of students who have

cognitive disabilities are being suspended at high rates from integrated school settings. The inability to access proficient schools contributes to segregation of children with disabilities.

- **Access to publicly supported housing for persons with disabilities & Lack of affordable, accessible housing in range of unit sizes**

It appears that the City needs far more affordable, accessible units. Publicly supported housing as of 2016 is serving 6,934 households; however, individuals with ambulatory disabilities alone is 26,013. Without accessible, affordable housing, persons with disabilities often have to opt to live in segregated settings for individuals with disabilities only.

At the 1st Public Hearing the Advocacy Center Representative said that contractor fraud is still affecting residents living with disabilities. In addition, a resident said that HANO does have a limited amount of Vouchers to assist with rent for people living with disabilities.

- **Access to transportation for persons with disabilities**

Persons with disabilities according to Maps 16a and 16b are congregated more in downtown areas; however, those disabled who live outside of the downtown area experience barriers to transportation due to a 60 to 100% decrease in public transportation services into the Central Business District. (P. 14, <http://rideneworleans.org/wp-content/uploads/2015/08/sots2015new.pdf>). In addition, most taxi's do not have wheelchair accessible vehicles and the St. Charles Street car is not wheelchair accessible. Lack of transportation accessibility creates discrimination; whereas, individuals with disabilities cannot enjoy the same amenity as individuals without a disability.

Many residents at the 1st Public Hearing expressed dissatisfaction with the RTA in New Orleans saying there are not enough curb cuts for people living with disabilities to gain access to public transit.

- **Inaccessible government facilities or services**

As discussed earlier, the City and region has had lawsuits where they have had to enter into a settlement agreement including Jefferson Parish ensuring polling places were accessible and the City of New Orleans having to modify government buildings to ensure that they are ADA accessible. When government facilities and services are not in compliance with ADA rules, individuals with disabilities undergo disparate impact in their ability to access government and participate in the civic process.

- **Inaccessible sidewalks, pedestrian crossings, or other infrastructure**

Above charts shows the number of inaccessible sidewalks, pedestrian crossings, and other infrastructure at schools. Also, New Orleans has only one APA signal to assist the visually impaired in crossing the street. When City and regional infrastructure are not in compliance with ADA rules, individuals with disabilities undergo disparate impact in their ability to access needed services.

At the 1st Public Hearing residents overall made comments about sidewalks in disrepair and infrastructure. No specific comments about pedestrian crossings.

- **Land use and zoning laws**

Land use and zoning laws have been a barrier to disabled individuals finding affordable housing. The City of New Orleans has at times voted to reject a project or change zoning based on resident input that opposes affordable housing for disabled.

The following case regarding the property at 2535 Esplanade illustrates this contributing factor as it details how City officials voted to change the zoning on the property.

On August 6, 2012, the United States brought a case against the City of New Orleans (“City”) and the Louisiana State Bond Commission (“Bond Commission”) to enforce the Fair Housing Act and the Americans with Disabilities Act (“ADA”). The United States alleged that the City and the Bond Commission engaged in a pattern or practice of discrimination against persons with disabilities by taking a series of actions designed to block the Gulf Coast Housing Partnership (“GCHP”) and its non-profit partners from converting an abandoned nursing home into a 40-unit affordable housing development known as the “Esplanade.” Half the units of the Esplanade were intended to be generally available to persons with low income; half were intended as “permanent supportive housing” for homeless persons with mental and physical disabilities, including homeless veterans and emancipated youth. The United States’ also alleged that the City, through its Board of Zoning Adjustments (“BZA”) and its Historic District Landmarks Commission (“HDL”), discriminated by denying variance requests and a demolition permit necessary for the development of the Esplanade. In addition, the U.S. alleged that the City, through its Department of Safety and Permits, reclassified the Esplanade property so that it no longer was a permitted use in a district that allowed for multifamily housing. The United States alleges that the City undertook these and other actions in response to widespread community opposition to the Esplanade that is based on fear and stereotypes of its prospective residents with disabilities. The City denied that it violated the FHA or the ADA in connection with these matters but to avoid litigation entered into a settlement agreement with the U.S. which allowed building of affordable housing at the location. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/22/new_orleanssettle.pdf

Because of the restrictions regarding land use and zoning, individuals with disabilities can be left with few options other than segregated institutional living which contributes to segregation.

- **Location of accessible housing**

The following excerpt from a Times Picayune article discusses how the location of accessible housing was challenged based on neighbor concerns.

The Muses apartment generated some division between neighborhoods on either side of St. Charles Avenue. Central City residents, merchants and church leaders said it would restore badly needed affordable housing to the neighborhood, while a number of Coliseum Square residents criticized both its design and its density. The development included 211 apartments in the first phase, roughly 65 percent of which will rent at market rates, with the remainder set aside as affordable housing. The City Planning Commission voted against the project in the face of such criticism, but the City Council later gave its approval after the developers reduced the number of apartments and otherwise tweaked the design. http://blog.nola.com/tpmoney/2009/06/new_apartment_project_taking_s.html

Because affordable housing is often in concentrated areas of poverty due to land value, availability, and community opposition in low poverty areas, individuals with disabilities can be left with few options other than segregated institutional living which contributes to segregation.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Caused but Unresolved:

GNOFHAC vs. Jefferson Parish

On June 11, 2013 Jefferson Parish entered into a conciliation agreement with HUD and GNOFHAC to address a caused complaint by GNOFHAC that Jefferson Parish failed to fulfill its obligation to affirmatively further fair housing. The relief set out in the settlement agreement called for a new Analysis of Impediments, which was finally completed in 2016, and for the introduction of a fair housing ordinance to the Parish Council. The Parish Council has not yet considered any local housing anti-discrimination ordinances.

Cases Pending with HUD:

GNOFHAC currently has 16 cases pending with HUD against private entities in New Orleans. An additional six cases are pending in suburban parishes. The most common basis of discrimination for New Orleans complaints was disability (7), followed by familial status (5), race (3), and sex (1).

GNOFHAC is also party to a complaint, along with 18 other fair housing centers and the National Fair Housing Alliance, against Fannie Mae for failing to maintain its real estate owned properties in neighborhoods of color in New Orleans and Baton Rouge.

There are two pending cases against public entities in New Orleans. Cambridge Court LLC vs. City of New Orleans was filed in 2013 and alleges that the down-zoning of the overwhelmingly white Lakeview neighborhood had a disparate impact on protected classes. The restriction on multi-family housing was passed after a slight increase in Lakeview's minority population Post-Katrina. Post-Katrina, the African-American population grew from .7% to 3.4%. Similarly, the Latino population in Lakeview increased from 3.7% to 6%. Racial animus against the growing New Orleans Latino communities was well documented during the city's rebuilding efforts. In addition, public opposition to recent attempts by landowners to rebuild their pre-Katrina duplexes in Lakeview indicates racial bias.

GNOFHAC also has a pending case against HANO on behalf of a HCVP client who was denied access to a unit after the landlord found out the tenant had a disabled son. The son has subsequently passed away, but the client's case remains unresolved.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The Louisiana Equal Housing Opportunity Act is certified by HUD as substantially equivalent to the Federal Fair Housing Act. Like its federal equivalent, the statute protects individuals in seven protected classes. The Louisiana Attorney General's office is the only Fair Housing Assistance Program (FHAP) funded agency in the state.

Though not a part of Louisiana Equal Housing Opportunity Act, the state did pass housing protections for victims of domestic violence in 2015. The Louisiana Violence Against Women Act (LaVAWA) provide four key protections:

- Anyone in need of emergency assistance can contact the police without penalty.
- Victims of domestic violence can no longer be evicted because of the violence of an abuser.
- Survivors can no longer be denied housing solely on the basis of past abuse.
- Survivors can now terminate a lease early and move when necessary to ensure their safety.

The City of New Orleans has its own non-discrimination laws that extend additional Fair Housing Act protections to individuals based on the following characteristics: age, creed, gender identification, marital status and sexual orientation. The New Orleans Human Relations Commission is the municipal agency charged with enforcing the City's Human Relations Rights laws. The Commission accepts complaints from all New Orleans residents and visitors.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The Greater New Orleans Fair Housing Action Center (GNOFHAC) provides fair housing enforcement, education and outreach, policy advocacy, and homeownership protection throughout the state of Louisiana and is based in New Orleans.

GNOFHAC enforcement staff conduct fair housing investigations and provide legal representation to individuals who experience housing discrimination. GNOFHAC enforcement staff also routinely conduct testing of the greater New Orleans housing market in order to understand discriminatory trends and identify systemic discrimination. The organization regularly files enforcement actions against individuals and entities engaging in discriminatory practices. Since Hurricane Katrina, GNOFHAC has served more than 1,000 individuals and assisted in the recovery of \$5.43 million in monetary relief as a result of its enforcement actions. GNOFHAC has also negotiated numerous settlements and consent decrees requiring housing providers or local government entities to comply with fair housing laws. Private Sector Compliance

GNOFHAC trains over a thousand people each year about their fair housing rights and obligations through first time homebuyer classes, the annual Fit For King conference, and talks with students, neighborhood associations, local officials, housing providers, and volunteers. The Center has conducted numerous statewide and local media campaigns to inform consumers and housing professionals of their fair housing rights and responsibilities. GNOFHAC has also produced an original children's book, *The Fair Housing Five & the Haunted House*, which is used across the country to teach about fair housing and civil rights.

In addition to GNOFHAC, Southeast Louisiana Legal Services (SLLS), also provides some fair housing assistance to clients in the New Orleans regions. SLLS is the state's largest provider of free civil legal aid to low-income people and operates a housing division which primarily focuses on landlord-tenant law, but occasionally does fair housing work as well.

The Advocacy Center, a statewide non-profit that advocates for the human and legal rights of people with disabilities and seniors also assists with fair housing education and enforcement as it relates to disabilities in the New Orleans area.

4. Additional Information

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The City's new updated Comprehensive Zoning Ordinance includes new reasonable accommodations provisions that provide a clear written procedure for individuals with disabilities and developers of housing for people with disabilities to follow when requesting zoning and land use accommodations.

Earlier this year, HANO also revised its criminal background screening procedures. The new policy considers convictions rather than arrests, and does not bar anyone categorically, except where mandated by law.

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement:

The three agencies listed above provide local private fair housing outreach and enforcement.

- Lack of local public fair housing enforcement:

The City of New Orleans Human Relations Commission is empowered to investigate and adjudicate discrimination complaints in employment, public accommodations, and housing, but has not yet examined a fair housing case.

The Louisiana Department of Justice (LA DOJ) has adopted a standard of interpreting the Fair Housing Act that is inconsistent with federal law. The LA DOJ's standard requires that a respondent violate multiple, separate provisions of the Fair Housing Act in order for a case to be "caused." Under Federal Law, each of those provisions would be a separate violation of the law, and a respondent need only violate one for HUD to find reasonable cause. The LADOJ has not prosecuted a fair housing case and rarely completes investigations within the 100 day timeline required by law.

- Lack of resources for fair housing agencies and organizations:

GNOFHAC provides significant fair housing outreach and enforcement resources, but is underfunded relative to the need. The organization responds to complaints and conducts outreach statewide, and therefore has fewer resources dedicated exclusively to New Orleans.

- Lack of state or local fair housing laws:

Neither Louisiana nor New Orleans have source of income protections that would protect HCVP and other residents who receive assistance from housing discrimination. A 2009 GNOFHAC report examined 100 rental properties in the New Orleans area and found widespread discrimination against voucher holders. The HCVP program is currently 98% African American.

- Unresolved violations of fair housing or civil rights law
- Other

VI. Fair Housing Goals and Priorities

The City of New Orleans and the Housing Authority of New Orleans, in partnership with residents, representatives from the business, economic development, non-profit, faith, and other key community stakeholders, propose the fair housing goals and strategies listed below to address the challenges raised in this Assessment of Fair Housing. The goals and strategies reflect the balanced approach of increasing access to high opportunity areas and public investment in underserved neighborhoods.

Goal #1: High opportunity areas will lower barriers to expanded affordable housing through inclusive strategies including mandatory inclusionary zoning.

Goal #2: The City will prioritize public investments in transit, quality schools, healthy foods, parks, and other amenities in underserved communities according to priorities [identified by long-term residents?].

Goal #3: The City will work to reduce segregation by aggressively conducting fair housing testing and enforcement activities, in coordination and with dedicated funding to fair housing organizations.

Goal #4: The City will prioritize reducing housing discrimination in all its form to increase access in all neighborhoods for all residents, particularly protected classes.

Goal #5: The City will devote substantial funds towards housing preservation to address deficits in code enforcement and weather related challenges in maintaining housing stock.

Goal #6: Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and rental affordable housing, and permanently dedicating land to affordability.

Goal #7: City agencies will adopt an equitable healthy housing approach that recognizes the direct connections between housing and public health to address environmental hazards and toxins, chronic stress, violence, and other conditions that diminish quality of life.

Goal #8: Transit-dependent populations will have reliable, frequent, and affordable access to multimodal transportation options.

Goal #9: The City will ensure that its internal policies and practices will advance access for people with disabilities, in compliance with all local, state, and federal requirements.

Goal #10: The City will launch a public awareness campaign designed to create broad-based support for fair housing efforts throughout the NOLA metropolitan region based on a shared understanding of housing equity as the cornerstone of broad-based economic prosperity.

The City and HANO will deploy the following strategies to achieve the goals stated above:

- Preserve existing supply and expand the total supply of affordable housing rental and homeownership opportunities throughout NOLA.
 - Use NHIF funds for homeowner and renter rehabilitation for creating neighborhood stability across the City, with priority in high opportunity neighborhoods.
 - Advocate to direct more public land towards affordable housing, especially land within a quarter-mile of any high frequency transit stop (30 minute headway or less), or within high opportunity neighborhoods.
 - Advocate for City, NORA and HANO to continue to prioritize residential development on their available inventory with priority in high opportunity neighborhoods.
 - Expand affordability periods beyond minimum requirements on developments receiving public financing from the City, NORA, and HANO.
 - Prioritize affordable housing infill development within high opportunity neighborhoods
 - New large mixed income multifamily rental developments should be prioritized in high opportunity neighborhoods.
 - Implement mandatory inclusionary zoning that prioritizes affordable housing development in high opportunity neighborhoods.
 - Encourage the participation of landlords in the HCV program by streamlining processes and removing barriers to participation.
 - Promote reforms to current zoning regulations to prohibit the production of affordable housing in high opportunity neighborhoods.
- Anti-displacement
 - Pursue additional property tax relief for low-income homeowners.
 - Investigate other measures to preserve affordable rental units in gentrifying and high opportunity neighborhoods.
 - Adopt Health and Safety Standards for occupied rental housing in the form of a Rental Registry
- Fair housing law enforcement
 - Implement the HANO criminal background check policy.
 - HANO should determine feasibility for mobility strategies that do not reduce the number of families currently served under the Housing Choice Voucher (HCV) Program.

- The New Orleans City Council should draft and pass an ordinance that requires transparency and accuracy in background checks used to secure public and private rental housing.
- Improving Quality of Life in New Orleans neighborhoods
 - Advance equitable transit-oriented development for underserved populations. Reduce blight and vacancy by promoting alternate land use by creating new neighborhood amenities such as community gardens, playgrounds, and pocket parks.
- Prioritize City development incentives to support affordable housing investments in high opportunity neighborhoods and infrastructure upgrades, blight reduction efforts, and commercial development in underserved neighborhoods.
- The City of New Orleans should dedicate a fixed percentage of general revenue derived from developer and permitting fees, blight code violations, and other local revenue streams to affordable housing initiatives.
- The City and State should prioritize and target limited funding for high risk special needs populations in all programs.